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Cc: 'Pate, Ronald'; 'Marshall, Brent'
Subject: RE: CCP Improvement Meeting - 01-10-01 - Meeting Minutes



Change Control, Participants in the January 10, 2001 Meeting, and Observers:

I am writing to request clarification, possible revision, and inclusion of a number of items contained in and missing from the minutes of this meeting.

I recognize that producing minutes for lengthy and free flowing dialogue is a difficult undertaking. Typically in such circumstances I am accustomed to seeing some sort of "review" or "approval" process among the participants. I can't find any guidelines in the CCP document, or past minutes going back a year or so - since the dissolution of the Steering Committee. Please accept my comments and requests below as being offered in good faith to produce a fully meaningful record of significant discussion and not as any criticism of the BellSouth scribe's intent.

(1) During the Changes to the Process section (page 2, item 2), Bill Grant of Telcordia asked that the BellSouth CC Team specify the scope of its empowerment to act during the meeting. Valerie Cottingham stated that the CC Team could only agree to and support BellSouth's proposals established before the meeting and was not empowered to commit BellSouth to any changes in position at the meeting.

I believe that this discussion is fundamental to an understanding of the process and request that it be included in a corrected version of the minutes.

(2) In the same section, the minutes state "BellSouth agreed to the e-mail ballot as long as BellSouth has the right to 'veto' a change that could not be supported as proposed. There were no objections."

BellSouth's statement was not presented as something upon which the other participants could vote, it was simply BellSouth's statement. It has not been the group's practice to object to statements made by other participants. Further, the sentence could be read to indicate that other participants agreed that BellSouth could veto changes, which is not the case. The phrase "There were no objections." should be stricken from the minutes. In addition, the minutes should reflect that there was considerable discussion of where the burden to complain (dispute) would lie when BellSouth exercised its "veto" - this discussion resulted in the first bulleted action item on page 3 and needs to be reflected in this section of the minutes.

(3) In the E-mail Ballot section (page 2, item 3), the minutes state "It was agreed the email ballot would be used for changes discussed in today's meeting only." While this is accurate, it is also incomplete -- the participating CLECs clearly indicated that the email ballot process was also their current desired permanent solution. I included a full write-up of the process for possible inclusion in the ballot, and no CLEC has subsequently voiced any objection to that proposal. I understand that BellSouth in good faith does not believe that such a CLEC consensus exists.

Given that the item was not balloted, I proposed this matter be discussed during the meeting scheduled on February 21, 2001, and request that any participating CLEC having an objection to the CLEC process recommendation or my representation of the CLEC position please contact me directly. For convenience, I have attached the CLEC Recommendation to this email.

Thank you for your consideration.

Docket No. 2000-465

JMB-R11

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Jay M. Bradbury
AT&T
404-810-8005

Docket No. 2000-465
JMB-R11
Page 3 of 5

[The following is the complete CLEC proposal seeking permanent adoption of the process discussed and used during the January 10, 2001 CCP-IP Meeting]

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes (format, typographical errors, clarifications of meaning, etc.) may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. The CCP participants present at the meeting (in person or by teleconference) will reach an initial determination regarding the requested change(s) by "consensus". For this purpose consensus will mean that no participant has serious objection to the determination of the group. The following initial determinations may be applied:

- Meeting Consensus (BellSouth and the other meeting participants have no serious objection to the change. The change will be balloted for Industry Consensus with the indication that a meeting consensus was reached.)
- Contested Issue (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are firm. The proposals will be balloted for Industry Consensus and the structure of the ballot will indicate that a choice between alternatives must be made.)
- Not Ready for Balloting (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are not firm. The request will not be balloted and will remain open for review during subsequent monthly meetings. The CCP participants will continue to use the associated current change control process. Working documentation reflecting both the current and proposed language may be created to facilitate further discussion.)
- Implement as Cosmetic (BellSouth and the other meeting participants determine that the requested change is a clarification of meaning with no potential negative impact. The change will be implemented and the Change Request will be updated to implemented status and update distributed as per the normal process.)

Subsequent to this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution to determine the Industry Consensus. The official Industry Consensus ballot will detail the change(s) being requested, and the significant arguments presented for and against the change during the review. As noted above, the ballot will indicate whether issues are being voted upon as the result of a Meeting

Consensus or as a Contested Issue. Each issue presented on the ballot will contain a statement of the change to be approved and in the case of a Contested Issue, a summary of arguments for and arguments against the alternatives. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their votes. Only ballots transmitted before midnight of the due date will be counted. BellSouth and each CLEC are allowed one vote on each issue presented on the ballot. The CCCM, or other designated individual will cast each CLEC's votes. The BCCM, or other designated individual will cast BellSouth's votes.

The ballot (a sample ballot may be found in Appendix __) will allow BellSouth and the CLECs to indicate their agreement or disagreement with the proposed change across a five-step continuum as shown here:

A	B	C	D	E
Agree	Generally Agree	Neutral	Somewhat Disagree	Disagree

When a Contested Issue is presented on the ballot there will be a continuum for each of the alternatives and the voter must disagree with one (and only one) of the two.

Industry Consensus will exist and the change will be implemented whenever two-thirds of votes cast by the due date are cast in categories A through D. No consensus will exist if over 1/3 of votes for a change are cast in category E -- "disagree".

1 BELLSOUTH TELECOMMUNICATIONS, INC.

2 DIRECT TESTIMONY OF RONALD M. PATE

3 BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

4 DOCKET NO. 11900-U

5 November 13, 2000

6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9

10 A. My name is Ronald M. Pate. I am employed by BellSouth
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
12 Services. In this position, I handle certain issues related to local
13 interconnection matters, primarily operations support systems ("OSS").
14 My business address is 675 West Peachtree Street, Atlanta, Georgia
15 30375.

16

17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18

19 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
20 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of
21 Business Administration from Georgia State University. My professional
22 career spans over twenty-five years of general management experience in
23 operations, logistics management, human resources, sales and marketing.

1 I joined BellSouth in 1987, and have held various positions of increasing
2 responsibility.

3
4 Q. HAVE YOU TESTIFIED PREVIOUSLY?

5
6 A. Yes. I have testified before the Public Service Commissions in Alabama,
7 Florida, Georgia, Louisiana, South Carolina, the Tennessee Regulatory
8 Authority and the North Carolina Utilities Commission.

9
10 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

11
12 A The purpose of my testimony is to address BellSouth's response to Issue
13 5, Line Sharing and Issue 7, Operations Support Systems ("OSS") as
14 identified in Georgia Public Service Commission Docket No. 11900-U,
15 Second Procedural and Scheduling Order. I will also address the FCC'S
16 Third Report And Order And Fourth Further Notice Of Proposed
17 Rulemaking in CC Docket 96-98 (FCC 99-238); Released November 5,
18 1999, (UNE Remand Order) as its relates to BellSouth's OSS including a
19 new requirement that BellSouth must provide Competitive Local Exchange
20 Carriers ("CLEC"s) access to loop make-up data via BellSouth's OSS.
21 Additionally, I will address BellSouth's OSS solution to satisfy the FCC's
22 Third Report and Order in CC Docket No. 98-147 and Fourth Report and
23 Order in CC Docket No. 96-98, released December 9, 1999 (Line Sharing

1 Order) requiring that incumbent LECs unbundle the high frequency portion
2 of the loop to permit the CLECs to provide xDSL-based service by sharing
3 the lines with the incumbent's voiceband service.
4

5 ***Issue (7) (a) Operations Support Systems ("OSS"): What pre-ordering and***
6 ***ordering functionalities must BellSouth make available to CLECs to***
7 ***support CLECs ordering of xDSL Loops, in what form must***
8 ***BellSouth make such functionalities available, and by when must***
9 ***BellSouth make such functionalities available?***

10 ***(7) (b) Operations Support Systems ("OSS"): Should BellSouth be***
11 ***required to make available to CLECs an integrated pre-ordering and***
12 ***ordering electronic interface OSS, and if so by what date?***
13

14 Q. DID THE FCC'S UNE REMAND ORDER IMPACT BELLSOUTH'S OSS
15 AS THESE OSS ARE USED BY CLECS?
16

17 A. The UNE Remand Order did not impact the existing CLEC OSS access
18 offered by BellSouth other than to specify at paragraph 426 that "the pre-
19 ordering function includes access to loop qualification [make-up]
20 information."
21

1 Q. WHAT IS BELLSOUTH'S RESPONSE TO THE FCC'S REQUIREMENT
2 THAT LOOP MAKE-UP INFORMATION BE AVAILABLE TO CLECS AS
3 PART OF THE PRE-ORDERING FUNCTION?
4

5 A. BellSouth has developed and implemented procedures to provide CLECs
6 with detailed loop make-up information via the manual Service Inquiry (SI)
7 process. Additionally, BellSouth has under development a detailed
8 mechanized Loop Make-up pre-order process that is accessible through
9 all current electronic interfaces that support pre-order functions (LENS,
10 TAG, and RoboTAG™). This process will be available to any CLEC that is
11 interested in incorporating these procedures into its interconnection
12 agreement. BellSouth witnesses Ms. Caldwell and Ms. Cox address the
13 costs and BellSouth's proposed rates associated with the work required to
14 incorporate this process into the pre-ordering function.
15

16 Q. PLEASE DESCRIBE THE MANUAL LOOP MAKE-UP SI PROCESS.
17

18 A. The loop make-up data is defined as the physical characteristics of the
19 loop facilities. The data begins at the BellSouth central office, is listed in
20 sequential order, and ends at the serving distribution terminal. Loop
21 make-up data consists of such information as cable gauge and length,
22 bridged taps, load coils, presence of Digital Loop Carrier ("DLC"), and
23 other equipment that is part of local loop facilities.

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The CLEC completes the "Customer Information" section of the Loop Make-up SI form indicating if it wants the loop make-up by telephone number or address/circuit identifier. The CLEC submits the Loop Make-up SI form to the Complex Resale Services Group ("CRSG") or their Account Team with a Local Service Request ("LSR"). The CRSG/Account Team forwards the SI form to BellSouth's Outside Plant Engineering Service Advocacy Center ("SAC"). The SAC verifies the availability of loop facilities. If the Loop Make-up SI indicates the CLEC wants the make-up by telephone number or circuit identifier the SAC will return a specific make-up for the requested telephone /circuit identifier. If the Loop Make-up SI indicates the CLEC wants the make-up by address, the SAC will return a specific make-up for the requested address.

The SAC will supply make-up for either suitable copper pair(s) or DLC pairs as requested by the CLEC for the requested address, telephone number or circuit identifier. If either a copper pair, or DLC, but not both exists at that address/telephone number/circuit identifier, the SAC will indicate in the "Comments Section" which is not available at the requested address/telephone number. The following is an example comment for an existing DLC make-up where a copper pair does not exist: "Provided DLC make-up at above address, no copper pairs exist at this location". Again, the loop make-up will be listed in sequential order starting at the central

1 office and ending at the end user terminal. The SAC will return the
2 completed Loop Make-up SI to the CRSG/Account Team. The
3 CRSG/Account Team reviews the SI form for completeness and forwards
4 the loop make-up SI request along with the LSR to the Local Carrier
5 Service Center ("LCSC") for confirmation of a complete and accurate LSR.
6 The CLEC returns the Loop make-up response to the CLEC via electronic
7 mail. The LCSC provides a firm Order Confirmation ("FOC") to the CLEC
8 and generates a service order that automatically completes for billing the
9 service.

10
11 Q. IS THE MANUAL LOOP MAKE-UP SERVICE INQUIRY MERELY AN
12 INTERIM PROCESS UNTIL ELECTRONIC ACCESS IS AVAILABLE?

13
14 A. No. The manual Loop Make-up ("LMU") SI process will continue to be a
15 means for obtaining loop make-up information, even after electronic Loop
16 Make-up functionality is available. It will be necessary to use this process
17 for those situations where the Loop Facilities Assignment Control System
18 ("LFACS") is not sufficiently populated with the data needed to make a
19 decision and thus the electronic LMU query does not meet the CLEC's
20 need. Additionally, this process will remain for those CLECs who choose
21 not to deploy the systems needed for the electronic query for LMU.
22 CLECs may obtain documentation for the current Unbundled Network
23 Element ("UNE") pre-ordering and ordering information pertaining to

1 BellSouth's manual loop make-up at BellSouth's Website:

2 <http://www.interconnection.bellsouth.com/guides/bpobr.html>

3

4 Q. CAN YOU ESTIMATE THE QUANTITY OF BELLSOUTH LOOPS THAT
5 HAVE DETAILED LOOP INFORMATION POPULATED WITHIN LFACS
6 THEREBY REDUCING THE NEED FOR A MANUAL SI?
7

8 A. While 100% of BellSouth's loops are populated in LFACS with certain
9 basic information, not all will have the detailed loop make-up information.
10 As a rule, BellSouth has populated detailed loop make-up for its designed
11 services which require special engineering and provisioning and often are
12 served by more than one central office or wire center. BellSouth has not
13 populated LFACS in the past with detailed loop make-up information for
14 non-designed services that require no special provisioning and are served
15 by one central office or wire center because it did not need the detailed
16 loop make-up information on these services. However, in the high-
17 populated metropolitan areas where the marketing efforts of CLECs are
18 most likely to be concentrated, it is approximated that as much as 80% of
19 loops with detailed loop make-up information are populated in LFACS. So
20 it is only for that remaining small percentage of loops that the manual SI
21 process may have to be utilized. And whenever CLECs must use the
22 manual SI process for these remaining loops, BellSouth will load the
23 resulting loop make-up information in LFACS for future queries.

1

2 Q. DID THE UNE REMAND ORDER REQUIRE ELECTRONIC ACCESS TO
3 BELLSOUTH'S OSS FOR CLEC XDSL SERVICE REQUESTS?

4

5 A. No. The FCC UNE Remand Order did not require access to pre-order and
6 ordering functionality associated with xDSL service request be electronic.
7 The FCC stated "That interface and gateway issues are already captured
8 in the nondiscriminatory access requirements of the Local Competitive
9 First Report and Order."¹ The FCC further stated that the "LEC must
10 provide the requesting carrier with nondiscriminatory access to the same
11 detailed information about the loop that is available to the incumbent
12 LEC."²

13

14 Q. IS BELLSOUTH DEVELOPING A MEANS TO PROVIDE CLECS WITH
15 ELECTRONIC ACCESS TO LOOP MAKE-UP INFORMATION AND
16 ELECTRONIC ORDERING OF XDSL LOOPS?

17

18 A. Yes. BellSouth is developing a comprehensive electronic process for pre-
19 ordering and ordering for CLECs via the Telecommunications Access
20 Gateway ("TAG"), RoboTAG™ and Local Exchange Navigation System
21 ("LENS"). It provides electronic access to loop make-up information from
22 the Loop Facilities Assignment and Control System ("LFACS") and

¹ CC Docket 96-98, Paragraph 426, page 193, released November 5, 1999

² CC Docket 96-98, Paragraph 427, page 193, released November 5, 1999

1 electronic ordering of xDSL loops. BellSouth is also enhancing the
2 Electronic Data Interchange ("EDI") to provide electronic ordering of xDSL
3 loops. These enhancements are currently in beta testing with selected
4 CLECs. Interested CLECs will need to conduct System Readiness Testing
5 ("SRT") with BellSouth prior to using these new functions when they
6 become available in production. If they have not done so already, CLECs
7 must also upgrade their TAG interfaces to the TCIF 9.0 version in order to
8 test the new functions and then use them in production. CLECs may
9 obtain information on the manual and electronic ordering of BellSouth
10 Loop Make-up at the BellSouth Website:
11 <http://interconnection.bellsouth.com/products/UNE/bstlmu.pdf>.

12

13 Q. HOW WILL BELLSOUTH IMPLEMENT THIS PLAN FOR ELECTRONIC
14 ACCESS TO LOOP MAKE-UP INFORMATION AND ELECTRONIC
15 ORDERING OF XDSL LOOPS?

16

17 A. BellSouth is implementing a vendor solution provided by Telcordia
18 Technologies, Inc. to provide the OSS necessary for the pre-ordering,
19 ordering and provisioning of CLEC xDSL loops. This extensive technical
20 solution provides Pre-Existing Licensed Software and Marketable
21 Licensed Software and Services to Integrate Licensed Software for CLEC
22 xDSL into BellSouth's operations environment. As an example, the
23 solution includes the establishment of a new corporate gateway along with

1 a new system architecture for the processing of Local Service Requests
2 ("LSRs") for xDSL loops.

3
4 The Corporate gateway establishes a single entry point for processing of
5 xDSL requests. It provides a flexible and expandable independent
6 gateway that has security, logging and mapping capabilities,

7 The Corporate gateway is configured to provide CORBA interfaces for the
8 TAG client APIs from the CLECs and an interface for BellSouth's OSS.

9 This allows pre-ordering and ordering functionality utilizing BellSouth's
10 LENS, TAG, and Robo@Tag electronic interfaces. It also provides a
11 navigator interface for the Local Service Requests Router ("LSRR"), which
12 permits firm ordering functionality utilizing the BellSouth EDI electronic
13 interface.

14
15 The new system architecture known as Delivery Order Manager will
16 automate many of the service requests functions. Delivery Order
17 Manager can be described as a work flow sequencing and control
18 "engine" that works with partner applications to accept and process
19 service requests. Delivery Order Manager will manage the access to all
20 the databases needed to process a request. Some commonly known
21 databases for pre-order and order functionality are CRIS, CABS, RSAG,
22 ATLAS, and P/SIMS. In addition, Delivery Order Manager will access
23 LFACS for queries for loop make-up information. Delivery Order Manager

1 also interfaces with a new Service Order Generator for mechanized
2 service order creation allowing flow through of the requests to BellSouth's
3 Service Order Communications System ("SOCS"). In addition to the
4 software requirements and associated software Right-To-Use ("RTU")
5 fees, the Telcordia provided solution also provides support services.
6 Support services include such items as:

- 7
- 8 • Platform planning and support
- 9 • Installation and system administration support
- 10 • Services integration testing
- 11 • Training and documentation
- 12

13 Q. WHAT IS THE CURRENT VALUE OF THE SOFTWARE AND SERVICES
14 SCOPE OF WORK THAT WILL BE PERFORMED BY TELCORDIA FOR
15 BELLSOUTH IN THE UNE REMAND FOR XDSL?
16

17 A. The software and service fees total approximately \$28,500,000 for the
18 pre-ordering and ordering software and services provided by Telcordia
19 Technologies, Inc. This includes 3 enhancements to incorporate newly
20 identified functionality necessary to provide a full compliment of pre-order
21 and order capabilities.
22

1 Q. BASED ON CURRENT PLANS, WHEN WILL ELECTRONIC PRE-
2 ORDER AND ORDERING CAPABILITIES BE AVAILABLE UNDER THE
3 TELCORDIA SOLUTION?
4

5 A. BellSouth currently has the pre-order functionality which includes, loop
6 make-up and the xDSL compatible loop firm order functionality in a Beta
7 testing environment. The pre-ordering functionality for xDSL is targeted for
8 deployment into the production environment in mid-to-late November
9 2000. BellSouth has encountered some problems that have delayed
10 deployment of xDSL firm ordering functionality. BellSouth is working with
11 Telcordia to establish dates when these problems will be corrected.
12

13 Q. PLEASE SUMMARIZE THE BENEFITS OF THE TELCORDIA SOLUTION
14 FOR CLEC XDSL PRE-ORDERING AND ORDERING.
15

16 A. The Telcordia solution provides CLEC xDSL pre-ordering and ordering
17 functionality that is fully integrated, highly extendable and scalable end-to-
18 end with maximum reuse of function. Through a strategic supplier
19 relationship, BellSouth benefits from expert planning assistance from a
20 world-class OSS and technology supplier. Finally, and very important,
21 BellSouth and its CLEC customers realize reduced costs from elimination
22 of complex product selection and multi-supplier systems integration work.
23

1 Q. DOES BELLSOUTH PROVIDE ACCESS TO OTHER DATABASES THAT
2 MAY BE USEFUL IN OBTAINING PRE-ORERING INFORMATION IN
3 CONNECTION WITH THE PROVISIONING OF CLEC XDSL SERVICE?
4

5 A. Yes. BellSouth provides information from its Loop Qualification System
6 ("LQS"). LQS was designed as a tool for Network Service Providers, the
7 purchasers of BellSouth's tariffed industrial class ADSL offering (as
8 opposed to BellSouth's business class ADSL offering) to determine
9 whether a particular service location is qualified for BellSouth's industrial
10 class ADSL offering based on BellSouth's defined technical parameters.
11 In other words, by entering a telephone number, LQS provides the user
12 with a qualified "yes/no" response based on the technical parameters of
13 BellSouth's industrial class ADSL offering. LQS does not provide loop
14 make-up information as contemplated by the FCC's xDSL requirement.
15 Subsequent to the FCC's UNE Remand order, LQS was made available
16 for use by CLECs on an interim basis until the mechanized loop make-up
17 interface is deployed. However, the purpose of LQS did not change with
18 providing access to CLECs – it remains a tool designed to provide a
19 response to the inquirer if the location is qualified for BellSouth's ADSL
20 service. Once again, LQS does not provide the level of detailed
21 information in order that a CLEC may make an independent judgment
22 about whether the loop is capable of supporting advanced services
23 equipment the CLEC intends to install.

1

2 Q. HOW DOES A CLEC OBTAIN ACCESS TO LQS?

3

4 A. A CLEC may contact its BellSouth account team to obtain information on
5 gaining access to LQS. The account team will assist with the appropriate
6 documentation necessary to obtain a password and resulting access to
7 LQS. CLECs may obtain a Loop Qualification System DLEC/CLEC Job
8 Aid via the BellSouth Website:

9 <http://www.interconnection.bellsouth.com/guides/bpobr.html>

10

11 Q. YOU HAVE REFERRED TO BOTH BELLSOUTH INDUSTRIAL CLASS
12 ADSL AND BUSINESS CLASS ADSL. PLEASE DIFFERENTIATE.

13

14 A. My reference to BellSouth's industrial class ADSL is describing a low
15 speed service, downstream data rate up to 1.5 Mbps and upstream data
16 rate up to 256 Kbps. The cost structure for this offering does not support
17 special actions by BellSouth to either condition an existing loop or to
18 provide a new loop in order to make ADSL work at a given location. The
19 1.5 Mbps x 256 Kbps offering, referred to as industrial service, is a "best
20 effort", low cost, mass market offering.

21

22 My reference to BellSouth's business class ADSL is describing a high-
23 speed service with data rates of:

- 1 • 384 Kbps x 384 Kbps
- 2 • 768 Kbps x 512 Kbps
- 3 • 1.5 – 1.8 Mbps x 512 - 768 Kbps
- 4 • 2 – 4 Mbps x 640 – 896 Kbps
- 5 • 4 – 6 Mbps x 640 – 896 Kbps
- 6 • 192 Kbps x 192 Kbps.

7

8 The business class offering will provide network performance levels to be
9 obtained in BellSouth's network and loop conditioning to provide a desired
10 class of service including symmetric and asymmetric data rates.

11

12 The BellSouth business class ADSL is the comparable service to CLEC
13 loops requiring loop make-up in this docket because performance levels
14 for both are guaranteed.

15

16 Q. WHAT IS THE SOURCE OF THE LOOP INFORMATION CONTAINED
17 WITHIN LQS?

18

19 A. The database of record for loop make-up information is LFACS. Thus, the
20 source of loop information in LQS is LFACS. However, LQS also utilizes
21 the additional software systems described below:

22

- 1 • Loop Engineering Information System ("LEIS") - An umbrella system
2 with several modules, one of which is LEAD.
3
- 4 • Loop Engineering Assignment Data ("LEAD") - LEAD is a snapshot of
5 the LFACS database. It receives current data once a month for all wire
6 centers. LEAD is completely updated each month.
7
- 8 • Hands-Off Assignment Logic - ("HAL") HAL is a BellSouth developed
9 software system designed to pull information from LFACS and join
10 transactions that can not be performed by LFACS, including
11 assignment of most service orders, among which includes
12 assignments on ADSL facilities.
13

14 Q. IS DIRECT ACCESS TO LFACS OR LEIS/LEAD REQUIRED IN ORDER
15 TO PROVIDE CLECS WITH DETAILED INFORMATION ABOUT THE
16 LOOP?
17

18 A. No. BellSouth's obligation is to provide requesting carriers the same
19 underlying information that BellSouth has in any of its own databases or
20 other internal records³. BellSouth's mechanized OSS interface and
21 manual interface provides a means to submit either a mechanized LMU
22 pre-order query or a manual LMU Service Inquiry ("SI") to LFACS and

³ CC Docket 96-98, paragraph 427, page 193, released November 5, 1999

1 receive a response. In the case of LEIS/LEAD, access may be obtained
2 by CLECs for LQS which provides a "yes/no" qualified response.

3
4 ***Issue (5) (b) Line Sharing: How and under what rates, terms, and conditions***
5 ***should line sharing be provided?***

6
7 Q. WHAT PORTION OF THIS ISSUE ARE YOU ADDRESSING?

8
9 A. I will discuss BellSouth's implementation of line sharing as it relates to
10 BellSouth's OSS and BellSouth's associated cost of implementation. The
11 issue relating to Line Sharing rates will be addressed by Ms. Cindy Cox.

12
13 Q. PLEASE DESCRIBE BELL SOUTH'S APPROACH TO DEVELOPING
14 OSS FUNCTIONALITY THAT WILL ELECTRONICALLY PROCESS LINE
15 SHARING SERVICE REQUESTS.

16
17 A. The vendor solution provided by Telcordia Technologies, Inc. previously
18 described for CLEC xDSL pre-ordering and ordering functionality also has
19 a module to provide the OSS necessary for the pre-ordering, ordering and
20 provisioning of Line Sharing service.

21
22 Q. PLEASE SUMMARIZE THE BENEFITS OF THE TELCORDIA SOLUTION
23 FOR LINE SHARING TO BELL SOUTH AND ITS CLEC CUSTOMERS.

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A. In addition to those benefits previously described, the Telcordia solution offers electronic processing of Line Sharing service requests allowing flow-through within BellSouth's OSS. This includes the ability to inventory and assign BellSouth facilities and splitters at the pre-specified CLEC meet points. These capabilities provided by the Telcordia solution translate into reliable, fast and accurate processing of CLEC Line Sharing service requests. It provides state-of-the-art technology with the ability to process the anticipated volumes of requests in a cost-effective manner and to build future applications and functionalities.

Q. IS THE SCOPE OF WORK THAT IS TO BE PROVIDED BY TELCORDIA EXCLUSIVELY FOR CLEC OSS CAPABILITIES ASSOCIATED WITH THE CLEC XDSL AND LINE SHARING?

A. No. The majority of the work done in this effort is for OSS capabilities associated with CLEC xDSL and Line Sharing orders; however, Telcordia is performing additional work on Electronic Access Ordering ("EAO") functionality. EAO will provide ASR pre-order functionality for address validations and Connecting Facility Assignment ("CFA") inquiries. Approximately \$3.2 million is committed for licensed software Right-to-Use fees associated with EAO.

1 Q. WHAT IS THE CURRENT VALUE OF THE SOFTWARE AND SERVICES
2 SCOPE OF WORK THAT WILL BE PERFORMED BY TELCORDIA FOR
3 BELLSOUTH IN THE LINE SHARING EFFORT?
4

5 A. The software and service fees total approximately \$41,000,000 for the
6 Line Sharing software and services provided by Telcordia Technologies,
7 Inc. This does not include the approximate \$3,200,000 for software fees
8 described previously for EAO functionality.
9

10 Q. BASED ON CURRENT PLANS WHEN WILL ELECTRONIC PRE-
11 ORDERING AND ORDERING CAPABILITIES BE AVAILABLE UNDER
12 THE TELCORDIA SOLUTION?
13

14 A. As previously stated with the pre-ordering of xDSL, the deployment for
15 pre-ordering of Line Sharing is planned for mid-to-late November 2000.
16 Firm Order Line Sharing utilizing the vendor supplied solution by Telcordia
17 does not yet have a firm deployment schedule established. In cooperation
18 with the CLEC Line Sharing collaborative teams, BellSouth has
19 implemented an interim solution in the existing OSS utilizing the Local
20 Exchange Service Order Generator ("LESOG") to allow mechanized firm
21 ordering of CO-based BellSouth-owned splitter Line Sharing. This interim
22 solution was implemented for the production environment on September
23 30, 2000. This interim solution will be supplemented and replaced utilizing

1 the Telcordia solution in mid-to-late 2001. BellSouth plans to also offer
2 mechanized firm order of CO-based CLEC owned splitter Line Sharing
3 and Remote Line Sharing. These products are being developed jointly in
4 the Line Sharing Collaborative teams and will be mechanized as they are
5 developed.

6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

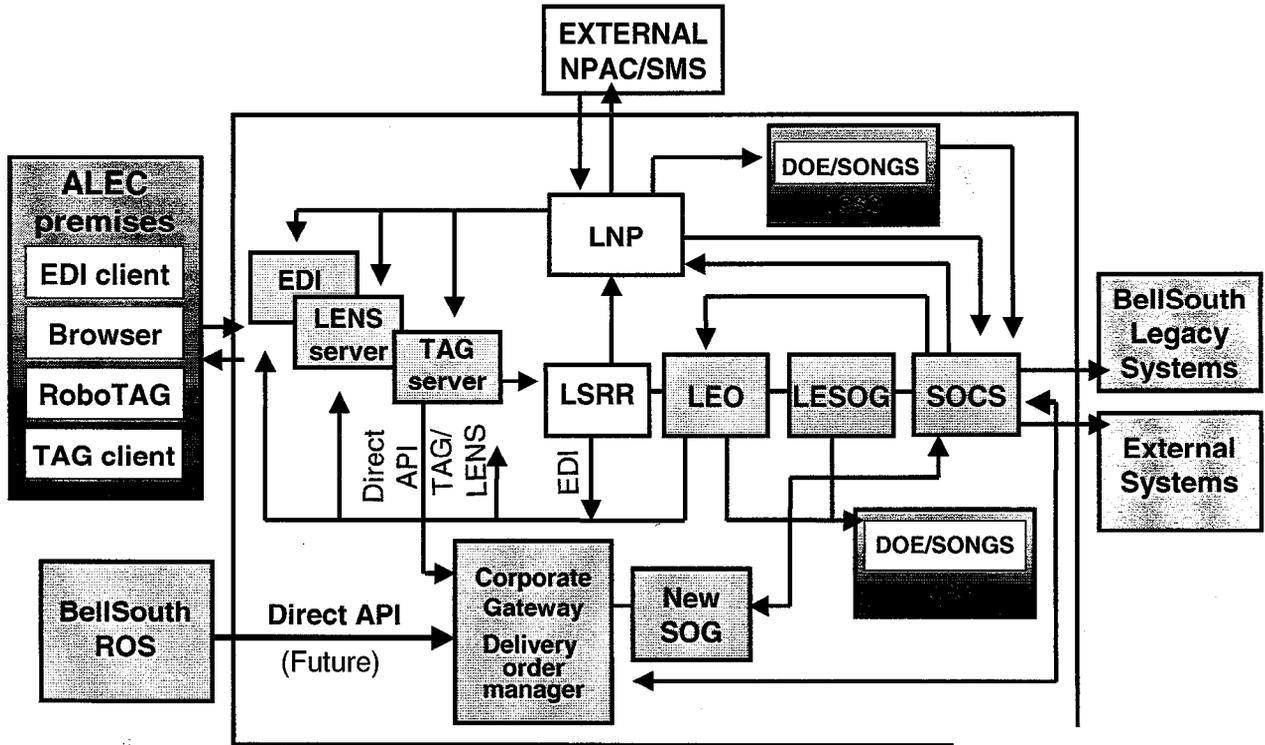
8

9 A. Yes.
10

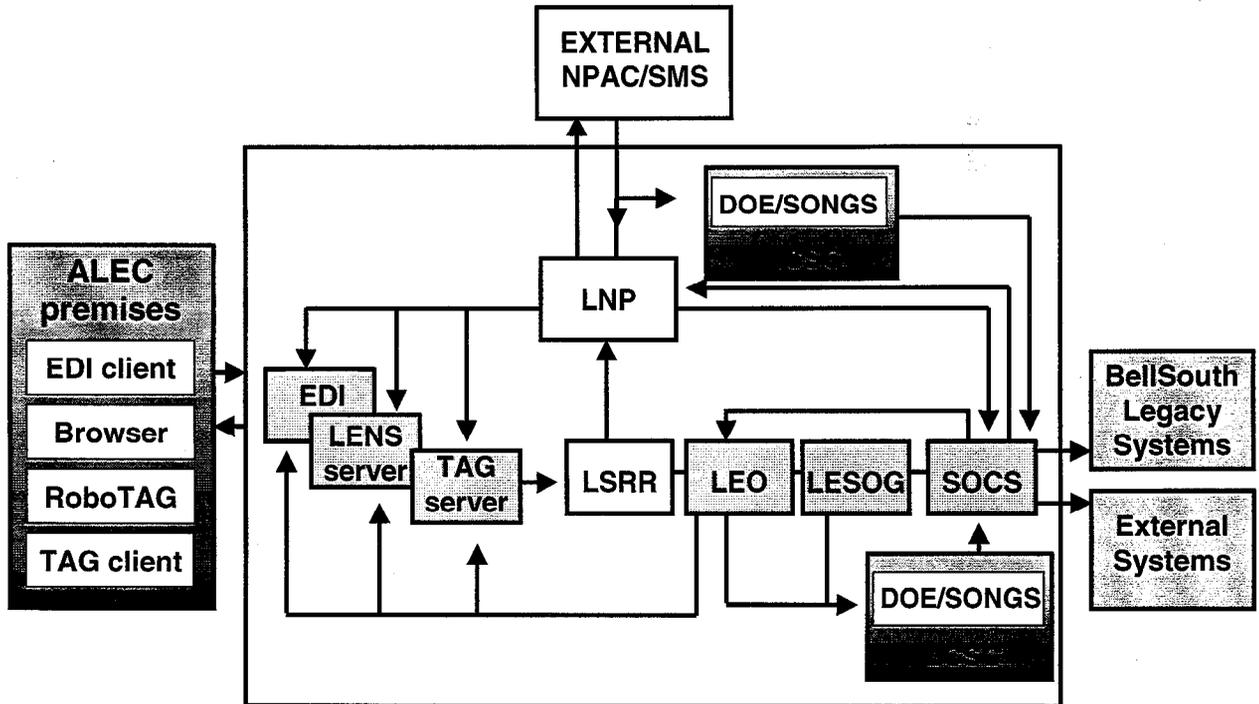
11

12

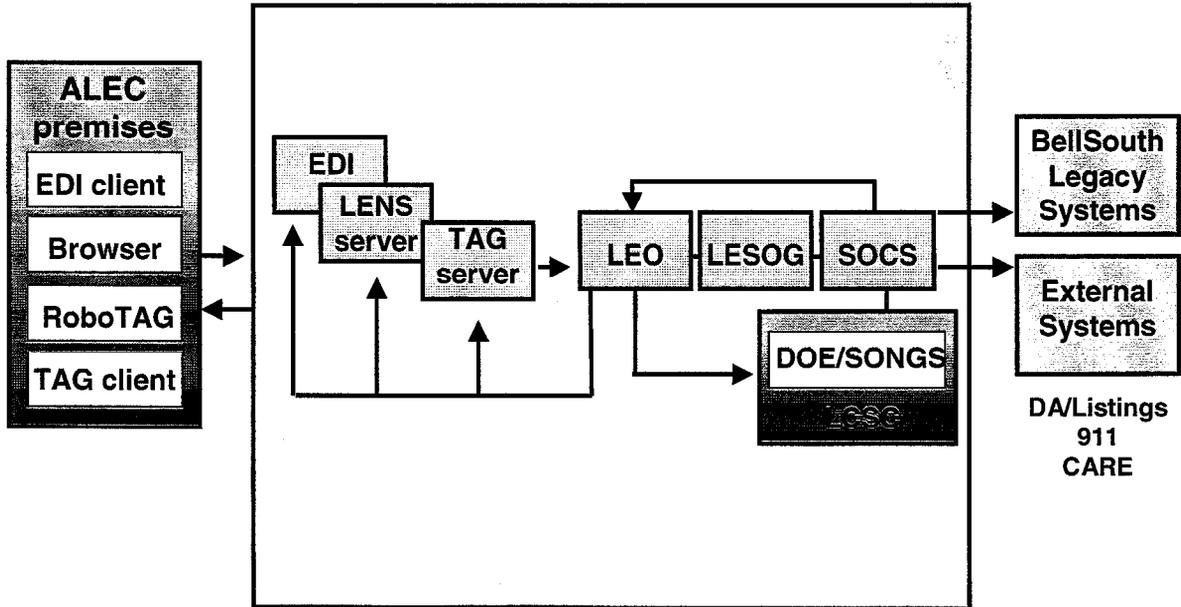
Architecture for ALEC LSRs LNP & DSL



Architecture for ALEC LSR processing including LNP



Architecture for ALEC LSR processing pre-LNP



ENCORE USER REQUIREMENTS

ESTABLISH NEW TEST ENVIRONMENT FOR CLEC/Vendor USE

**FINAL
ENC9651.DOC
DOCUMENT VERSION 1.0
DECEMBER 13, 2000**

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1. SCOPE

<i>User: Requirement Source (check all that apply)</i>	PSC Mandate	CLEC Request	X
	Regulatory	Increase Productivity/Flow-through	
	Other (Specify)	System Stability and Performance	

The scope of this document is to allow the CLEC/Vendor to test their applications against new release functionality. These transactions are:

- Pending Order Status
- Firm Order Confirmations
- Rejects
- Simulated Completion Notices
- Clarifications
- Jeopardies
- Functional Acknowledgements

The test environment will include ENCORE & Local Number Portability Systems that will be duplicated to match the ENCORE and Local Number Portability production systems. (LENS will be reproduced in the test environment for BellSouth internal use only.) The production legacy reference systems will be used in this CLEC test environment.

The scope of the CLEC Test Environment does not include interfacing with NPAC SMS (Number Portability Administration Center Service Management System) by BellSouth or the CLECs.

2. ASSUMPTIONS

Number	Description
5.1	This applies to TCIF-9.
5.2	TCIF-7 will not be supported.
5.3	The CLEC Test Bed will be brought forward to all new TCIF issues.
5.4	LSRs will originate at CLEC/Vendor premises using CLEC/Vendor applications and hardware.
5.5	EDI & TAG shall be supported for CLEC/Vendor use.
5.6	A maximum of ten (10) CLECs/Vendors shall be able to test at any given time across all applications.
5.7	Failover or redundancy of test bed platforms will not be provided in this environment.
5.8	BellSouth will do connectivity testing with each CLEC/Vendor in this test bed at the beginning of the test window.
5.9	Handling of application defects shall follow each application's normal production defect handling process.
5.10	Support of the CLEC test bed shall be Monday thru Friday, 9AM to 5 PM EST, excluding BellSouth Holidays.
5.11	Certification must be completed before use of the CLEC test bed.
5.12	BellSouth reserves the right to determine, based on functional changes, whether a minor release will be available for testing and provide the availability window via the CLEC notification process. NOTE: A minor release may not be available for testing until the next Major release.
5.13	The CLEC test bed will not support unscheduled testing.
5.14	The CLEC test bed will not support regression testing.
5.15	The CLEC test bed will not support after hours testing.
5.16	No backup or redundancy will be provided for this environment.
5.17	The CLEC test bed will not support volume or performance testing.
5.18	The CLEC test bed will be used for functional testing of CLEC/Vendor applications.
5.19	Billing and provisioning will not be completed in the test bed environment.
5.20	CLEC/Vendor LSRs that are designed to fallout will follow the normal process in this test environment.
5.21	Normal service rep profile capability will be provided in the test environment. New profiles will need to be established as desired in this environment. Existing production profiles will not function in this environment.

3. USER Requirements

Requirement #	Description
UR9651.0001	A new test environment will be created by the ENCORE system & LNP for CLEC/Vendor testing and will be available with the exclusion of scheduled down times.
UR9651.0002	This applies to TCIF-9 & any future issues.
UR9651.0003	The CLEC test bed will support one release at a time.
UR9651.0004	The test bed will be capable of supporting CLEC/Vendor testing of a release 30 days prior to implementation into production and 60 days after production.
UR9651.0005	Transaction entry will be via the Electronic Data Interchange & the Telecommunications Access Gateway only. NOTE: Transaction entry via the Web Based Interface will not be allowed in this test environment for CLEC/Vendor use.
UR9651.0006	The CLEC test bed will be used to test the pre-order process from query to response.
UR9651.0007	The CLEC/Vendor test bed will be used to test the ordering process from LSR entry through simulated Completion Notices.
UR9651.0008	The web-based interface will provide a web site for the purpose of simulating a completion notice.
UR9651.0009	Test Bed support will be available to the users for testing Monday – Friday 9:00 a.m. to 5:00 p.m. EST, excluding scheduled down time.
UR9651.0010	Revenue Accounting Offices (RAOs) for all 9 states may be used in testing.
UR9651.0011	Transactions identified as “New Solutions” will be rejected by the processing systems and an error message will be returned to the CLEC.

4. Glossary

Name	Description
ATLAS	Application for Telephone Number Local Administration and Selection
CABS	Carrier Access Billing System
CC	Company Code
CLEC	Competitive Local Exchange Carrier
COG	Corporate Order Gateway
CRIS	Customer Records Inquiry System
DOM	Delivery Order Manager
EDI	Electronic Data Interchange
ETET	End-to-End Testing
FA	Functional Acknowledgement

FOC	Firm Order Confirmation
IMS	Information Management System
IT	Information Technology
ITS	Information Technology Services
LCSC	Local Customer Service Center
LENS	Local Exchange Navigation System
LEO	Local Exchange Ordering
LESOG	Local Exchange Service Order Generator
LNP	Local Number Portability
LSR	Local Service Request
NPAC SMS	Number Portability Administration Center Service Management System
NS-CS	Network Services – Customer Service
NS-ESD	Network Services – Electronic Solutions Delivery
OCN	Operating Company Number
OSS	Operating System Standards
PAWS	Provisioning Analyst Work Station
PON	Purchase Order Number
PSIMS	Product and Services Inventory Management System
QA	Questionable Activity
RAO	Revenue Accounting Office
SOCS	Service Order Communication System
SOG	Service Order Generator
SRT	System Readiness Testing
TAG	Telecommunications Access Gateway
TCIF-7	Telecommunication Industry Forum – Issue 7
TCIF-9	Telecommunication Industry Forum – Issue 9
UAT	User Acceptance Testing
WSM	Work Station Manager

CLEC TEST BED ENVIRONMENT (CTBE)

Issue Log

Issue No.	Issue	BST Response
1031-01	Jill (AT&T) requested that BST add to the objective 997's, rejects, clarifications and completions.	<p>BellSouth will provide the following when applicable:</p> <ul style="list-style-type: none"> ▪ Acknowledgements ▪ Rejects ▪ Clarifications ▪ Confirmations ▪ Pending order statuses ▪ Jeopardies ▪ Completions
1031-02	Provide Phase I, II and III distinctions to reflect what functionality will be supported in each phase.	Full functionality will be delivered at implementation.
1031-03	<p>Multiple CLECs testing simultaneously. Number of CLECs that can test simultaneously is not known at this time. Number will be scaleable.</p> <p>CLECs questioned if the capacity will be specific to each application. CLECs also expressed concern for availability of enough test slots given the 60/60 and 30/30 Test Bed windows.</p>	<p>BellSouth will provide 10 simultaneous test slots. Slots will not be allocated per application, but across all applications. A 90-day window will be provided for CTBE on all major releases. BellSouth will determine, based on functional changes, whether a minor release will be available for testing in CTBE and provide the availability window in via CLEC notification process.</p>
1031-04	60 Days/30 Days prior and post production for Major and Minor releases, respectively. CLECs expressed concern on how defects will be managed.	New releases will be available 30 days prior to production date and 60 days after production date pursuant to criteria listed in 1031-03.
1031-05	Determine how defects will be managed with the 60/60 and 30/30 timeframes.	Two issues need to be addressed: 1) pre-prod defects, and 2) post-prod defects. What will be process to communicate; load to CTBE.
1031-06	Determine if regression testing will be supported.	Regression testing will not be supported
1031-07	Dedicated test accounts in production spread over all RAOs (dedicated to that region)	BellSouth confirms.

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CLEC TEST BED ENVIRONMENT (CTBE)

Issue Log

Issue No.	Issue	BST Response
1031-08	Order entry via EDI, and TAG interface (applies to both Interim and Full Production phases)	Interim phase no longer applies.
1031-09	LSRs submitted with a desired due date of 30 days in future (applies to Phase I only)	Since this requirement only applied to the Interim solution, it will be deleted.
1031-10	CLEC pending orders purged after finite number of days	CLEC pending orders purged ___ days after testing completed.
1031-11	Service orders originate at CLEC premise equipment – CLEC is responsible. The connectivity for the test bed will be the same for the CLEC as what is supported in production for the interface utilized (i.e., if accessing LENS via internet, testing for LENS would be supported via internet).	BellSouth confirms.
1031-12	Time of operation – Monday through Friday, 8am to 5pm EST (applies to both Interim and Full Production phases)	Test Bed support will be available to users for Monday through Friday, 8am to 5pm ET, excluding published holidays. Test cases may be sent Monday through Friday, 8am to 8pm ET, excluding published holidays, based on OSS availability.
1031-13	Determine if after hours testing will be supported.	No.
1031-14	Provide list of REQTYP's/ACT types that will be supported in each phase of the test bed implementation.	CTBE will support all REQIPYE/ACTTYPE combinations that are identified in the BBR-LO for the release loaded. If a new release implements a new REQIPYE/ACTTYPE, it will be implemented in CTBE also. Please consult the BBRLO to determine which REQIPYE/ACTTYPE(s) are supported.
1031-15	No backup or redundancy provided for this environment.	BellSouth confirms.

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CLEC TEST BED ENVIRONMENT (CTBE)

Issue Log

Issue No.	Issue	BST Response
1031-16	Does not replace existing connectivity and interface certification testing requirements	All parties wishing to test in CTBE must present Test Certification in non-LNP and/or LNP from CLEC Certification Test Manager. Access will be dependent upon which functionality party has been certified (i.e. LNP, Resale, or UNE). CLEC certification testing process is currently under revision.
1031-17	<p>Functional test desk environment that supports pre-order and firm order transactions, TAG and EDI, flow through and non-flow through transactions. The Helpdesk will provide support to the CLECs during testing.</p> <p>The CLECs recommended that the Help Desk functions include: scheduling, assistance on order entry, trouble reporting, coding problems, and documentation errors.</p>	The Test Desk/Help Desk functions are being developed and will be covered in project roll-out.
1031-18	Provide clarification on roles and responsibilities of Help Desk. Will there be a separate Test Desk?	See 1031-17
1031-19	Ensure that the following two problems in current testing platform/process will not be present in new Test Bed: (1) IT Business Requirements conflict with CLEC User Requirements and Business Rules. Test cases in application testing for TAG won't get pass edits because cases do not mirror business rules and requirements, (2) Inability to simulate production environment in current test environment because orders aren't allowed to process to completion.	CLEC User Requirements and CLEC Test Cases will follow business rules and system requirements for each release. Test cases will be allowed to process through to "simulated" completion.
1031-20	Volume testing not supported	BellSouth confirms.

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CLEC TEST BED ENVIRONMENT (CTBE)

Issue Log

Issue No.	Issue	BST Response
1031-21	<p>Provide CLECs ability to test a release before implementation.</p> <p>CLECs stated that TAG implementers need 60 days from time they receive API and documentation to code. They would not be ready to test in the "60 days prior" timeframe unless API and documentation are made available 30-60 days prior to start of Test Bed pre-production timeframe.</p>	<p>Pre-production testing in CTBE will start 30 days prior to production and continue to be available 60 days post production. The API Reference Guide will be available 60 days prior to CTBE, and 30 days prior to CTBE. This should allow CLECs time to complete coding and development prior to or during CTBE development.</p>
1031-22	<p>Ensure that the new Test Bed mirrors production (i.e., need the ability to test the full suite of transactions from 997, to FOC, Rejects, Clarifications, Rejects, Statuses and Completions).</p>	<p>See 1031-01.</p>
1031-23	<p>Investigate the 60/60 and 30/30 days' timeframes.</p>	<p>See 1031-04 and 1031-03.</p>
1031-24	<p>Investigate the ability for a CLEC to test a specific scenario at any given time.</p>	<p>Unscheduled testing will not be supported.</p>
1031-25	<p>Investigate the management of the release structure. Since BellSouth currently has several APIs active, how will the multiple APIs be managed in the Test Bed? What will be available for testing?</p>	<p>CLEC testing will be conducted with the most current production release. Only one API release (same as ENCORE release) will be available at a time in CTBE.</p>
1031-26	<p>Determine if impromptu testing will be supported.</p>	<p>See 1031-24.</p>
1031-27	<p>If a CLEC does not implement all functionality in a release but decides at a later date to implement the functionality, determine if a CLEC will be allowed to test the functionality at that time, say 3 months later, in the Test Bed.</p>	<p>See 1031-06. Releases will not remain available on CTBE beyond 90 days.</p>
1031-28	<p>Determine if the current release and the next release will be available for testing in the new Test Bed.</p>	<p>No. Only one release will be available for testing at any given time. 30 days prior to production it will be the next release and will be the current release 60 days post production.</p>
1031-29	<p>Order entry thru FOC; no order completion</p>	<p>See 1031-01</p>

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CLEC TEST BED ENVIRONMENT (CTBE)

Issue Log

Issue No.	Issue	BST Response
1031-30	No billing, no provisioning	BellSouth confirms.
1031-31	Order entry via EDI, and TAG.	See 1031-08.
1031-32	Interim Test Bed deployment by December (will use production databases)	No longer applicable
1031-33	Full Test Bed Solution by February, 2001 (incorporate copies of production databases)	Target date for Full Test Bed Solution is 03/31/01.
1031-34	Use live "test" accounts in production OSSs (applies to Phase I only). BST will establish test accounts.	BellSouth confirms that "live" test accounts in production OSSs will be used Full Test Bed solution.
1031-35	Establish shortened defect correction process	See 1031-05.
1031-36	Formal testing-there will be a managed schedule.	BellSouth confirms.
1031-37	Confirm if a CLEC can randomly send in test transactions or will they have access to Test Bed only through formal, scheduled testing.	See 1031-24.
1031-38	Provide clarification on whether connectivity, application and validation testing will be conducted in the Test Bed.	See 1031-16
1031-39	Determine if production date will be slipped if defects are found during CLEC pre-production testing.	BellSouth will continue to evaluate releases based on existing guidelines to determine if production date should be impacted.
1031-40	Determine if BellSouth will maintain its current testing requirements. Provide information on the difference between application and validity testing versus the functional testing for the Test Bed.	See 1031-16.
1031-41	Confirm if XDSL will be included in Phase III implementation.	XDSL will not be supported in Full Test Bed solution.
1031-42	Provide a process flow for CLECs to understand the steps and what will be required of them.	Process flow will be provided with application rollout.

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**CLEC TEST BED ENVIRONMENT (CTBE)
Issue Log**

Issue No.	Issue	BST Response						
1031-43	<p>The Interim Test Bed solution utilizes production application platforms to allow CLECs to begin testing before the end of 2000.</p> <p>The full test bed solution will comprise test bed versions of Encore applications, but continue to rely on production OSS platforms.</p> <p>Refer to "CLEC Test Bed Overview" presentation for architecture diagrams.</p>	<p>Interim Test Bed no longer applicable. BellSouth confirms that the full test bed will be comprised of test bed versions of Encore applications, but continue to rely on production OSS platforms.</p>						
1031-44	<p>Planning Dates</p> <table border="0"> <tr> <td>Interim Test Bed Solution</td> <td>December 2000</td> </tr> <tr> <td>LNP Capability</td> <td>January 2001</td> </tr> <tr> <td>Full Test Bed Solution</td> <td>February 2001</td> </tr> </table>	Interim Test Bed Solution	December 2000	LNP Capability	January 2001	Full Test Bed Solution	February 2001	<p>Interim dates no longer apply. Planning date for Full Test Bed Solution targeted for 03/31/01</p>
Interim Test Bed Solution	December 2000							
LNP Capability	January 2001							
Full Test Bed Solution	February 2001							

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Bradbury, J M (Jay) - LGA

From:
Sent:
To:

Bradbury, J M (Jay) - LGA
Monday, February 19, 2001 3:29 PM
'Change.Control@bridge.bellsouth.com'; Alan.Flanigan@twtelecom.com;
Andrew.Broder@lightyearcom.com; Annette.Cook@espire.net; annettey@lightyearcom.com; apatel3@telcordia.com; ASamson@birch.com; AZerillo@birch.com;
BellSouth@quintessent.net; best2@surfsouth.com; billg@telcordia.com;
bisinterfacecontrol@kpmg.com; bmurdo@KMCTELECOM.com; Bobik, Richard A - NCAM;
Bradbury, J M (Jay) - LGA; brutter@kpmg.com; bszafran@covad.com;
bwellman@idstelcom.com; c_and_m@bellsouth.net; carl.taylor@lecstar.com;
cassandrap@networktelephone.net; Catherine.Gray@alltel.com;
cchiavatti@usatelecominc.com; ceclia.ortiz@adelpiacom.com; cflangan@uslec.com;
changecontrol.bellsouth@onepointcom.com; Chapmanwe@cepb.com;
charrison@mpowercom.com; chaynes@trivergent.com; cheryl@eatel.com;
cheryl_acosta@stratosoilandgas.com; chrisg@pvtel.net; christine.shelton@cc.gte.com;
clhawk@KMCTELECOM.com; CoDavis@covad.com; colleen.e.sponser@wcom.com;
Connie@albionconnect.com; conniec@arrowcom.com; Craig@excelsior.com;
Craig, B. Douglas@MCI.com; CSteele@nuitele.com; csti@bellsouth.net;
daddymax@netbci.com; david.burley@wcom.com; DDougherty@birch.com;
Debra.Pasquale@btitele.com; default.user@bellsouth.com; DElliott@connectsouth.com;
desiree@communitytelephone.com; dfoust@deltacom.com; dgraham@mantis.com;
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ms.com; Gary@CSIL.net; generalg@cris.com; george@accesscomm.com;
gerri@lightyearcom.com; Glenn.Sonnier@usunwired.com; gulfoast@dotstar.net;
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Cc: Pate, Ronald; Marshall, Brent
Subject: RE: 02-21-01 CCP Improvement Mtg Agenda, Working Document & CLEC Testbed Issue Log

Change Control,

I have been able to conduct only a brief review of the "new" working document, however that brief review has raised questions.

The first thing I noticed was that portions of the "baseline" text did not match the Version 2.1 document posted on February 9, 2001 and dated February 1. I notice that Version 2.1.A was posted on February 16, 2001 - perhaps it and the "baseline" text of the working document match? I haven't had time to check.

Also I don't recall any notification that 2.1.A was being posted. Was this posting designed to correct the mismatch in posting and publication dates for Version 2.1?

The working document also does not reflect all of the open issues. Two examples - Changing the Process and Dispute Resolution.

Changing the Process does not contain the full CLEC position that I provided as the CLEC's representative during the construction of the e-mail ballot and that has been confirmed twice since the January 10, 2001 as being the current CLEC Recommendation.

Dispute Resolution reflects only BellSouth's language despite the indication at the January 31, 2001 meeting that it and all seven Contested Items from the ballot would be discussed in this meeting. Is the CLEC recommendation for the other items also not included in the working document?

I will only be able to join the meeting by telephone from 9 to about 10:30 or 11 am, but look forward to the discussion.

Thanks,
Jay

-----Original Message-----

From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Friday, February 16, 2001 1:38 PM
To: Alan.Flanigan@twtelecom.com; Andrew.Broder@lightyearcom.com;
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blsinterfacecontrol@kpmg.com; bmurdo@KMCTELECOM.com; bobik@att.com;
bradbury@att.com; brutter@kpmg.com; bszafran@covad.com;
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conniec@arrowcom.com; Craig@exceleron.com; Craig.B.Douglas@MCI.com;
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Page 2 of 4

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SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com;
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Christine.Schnelle@wcom.com; caren.schaffner@wcom.com

Subject: ID: 02-21-01 CCP Improvement Mtg Agenda, Working Document &
CLEC Testbed Issue Log

CLECs,

Attached is the agenda for the CCP Improvement Meeting, scheduled for
02-21-01 in Atlanta at the BellSouth Center.

In addition, included is a "new" version of the working document (colored)
that will be used during the discussion. This document has been updated
to include those items that were balloted and voted on by the CLECs as
well as issues that remain "open". Please note that some "cosmetic" changes
were made to this document, such as changing the terminology
"defects/expedites" to read "Defects and Expedites" or defects and/or expedited
features where appropriate. This was done to support agreed upon changes
from the 01-10-01 meeting.

Also attached is a copy of the CLEC Testbed issue log that will be discussed
at the 02-21 meeting.

Please let us know if you have any questions.

Thanks.

Change Control Team

Distributed Message

Message sent by: Change Control /m6,mail6a

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Change Request Log

CR Log #	S	T	Title	Date Sent	Open# Valued On Target	Open# Valued CR (Clerk Pulse Samp Rec'd Date)	Open# Valued CR (Clerk Pulse Samp Rec'd Date)	Review CR for Accomp. Target Date	Rev CR For Accomp. Date (Not sent Date)	Rev CR For Accomp. Date (Keep Rec'd)	Rev CR For Accomp. Date (Keep Rec'd)	Central CR (Not Target)	Review CR for Clerk (Actual Date)	CR Mgr Date (Actual Date)	Doc Mgr Rev. Mgr Request Target (Date)	Doc Chg Review Mgmt Request (Actual Date)	Internal Change Mgmt (Actual Date)	Internal Change Mgmt (Actual Date)	RFM (Actual Date)	RFM Notif (Target Date)	RFM Notif (Actual Date)	RFM Notif (Actual Date)	Self-Rep Notif (Target Date)	Self-Rep Notif (Actual Date)	Doc Change Notif (Target Date)	Doc Change Notif (Actual Date)	Doc Update Only Notif (Target Date)	Doc Update Only Notif (Actual Date)	Notes		
20232	N	S	Attention to Business Rules (Out Coop Communications)	11/29/00	12/01/00	N/A	N/A	12/01/00	01/07/01																					12/01/00 Being reviewed for acceptance	
20234	N	S	Connect Direct Fix (ALLTEL)	11/29/00	12/04/00	12/04/00	12/04/00	12/04/00	01/04/01																					12/04/00 Clarification received from Orig CLEC. Request being reviewed for acceptance	
20235	N	S	When A Number Has Been Picked In Error (ALLTEL)	11/29/00	12/05/00	N/A	N/A	12/04/00	01/03/01																					12/04/00 Being reviewed for acceptance	
20238	N	S	Mail Notification Lists for system outages (Network Ops)	12/04/00	12/11/00	N/A	N/A	12/11/00	01/10/01																					12/11/00 Being reviewed for acceptance 12/14/00- BellSouth determined to not be a defect. Writing on original to outsource closure. 12/18/00- AT&T accepted the validation response. BellSouth responded back that this is a feature one will be implemented in a year.	
20241	N	S	CN Returned on incomplete LSR version (AT&T)	12/15/00	12/13/00	N/A	N/A	12/15/00	12/15/00		12/14/00																				
20243	N	S	Class of Service (Telepacific Inc)	12/14/00	12/10/00	N/A	N/A	12/14/00	01/15/01																					12/14/00 Being reviewed for acceptance	
20244	N	S	Center Measurements & Reports for CLEC (Telepacific Corp)	12/14/00	12/19/00	N/A	N/A	12/14/00	01/15/01																					12/14/00 Being reviewed for acceptance	
20245	N	S	LENS/PAGE/ED Manual vs Mechanized Installation (Bell)	12/15/00	12/20/00	N/A	N/A	12/18/00	01/18/01																					12/18/00 Being reviewed for acceptance	
20246	N	S	LENS/PAGE - ability to view resold/LENE CS's (Bell)	12/15/00	12/20/00	N/A	N/A	12/18/00	01/18/01																					12/18/00 Being reviewed for acceptance	
20247	N	S	Interval from 5 to 4 days for SLI in TAG (Bell)	12/15/00	12/20/00	N/A	N/A	12/18/00	01/18/01																					12/18/00 Being reviewed for acceptance	
PENDING CR																															
20212020003	RC	S	The ability to use form for de-lifting that drops from #11/0A (AT&T)	8/12/99				8/18/99				N/A	6/19/00	6/19/00	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	standard form presented at 10:25 MSB. Standard form target date 2/01/01. The possibility of an electronic process for submitting #11 drops being investigated. CR #1120200003 target 10/15/00 to perform planning & analysis during 2000. 10-3-00 front end have with CLEC community. 10-19-00 Supercom met to review & reach consensus on data elements to be passed. 11-16 Subcom plan to finalize CR requirements. 11-16-00 This case filed relative to 4-digit entry for the year in LENS due to '0x comparison. Item 2 of CR re: viewing multiple CS's placed in planning status.
20212020003	RC	S	Passed CSR via TAG Pre-Order (AT&T)	8/12/99								N/A	6/19/00	6/19/00	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	6/28/00 (Chg) 9/28/99	
20212020003	RC	S	LENS - View Multiple CS's from Inventory (Telepacific)	05/02/00	05/05/00	N/A	N/A	05/02/00	05/21/00	N/A	N/A	05/31/00	N/A	6/19/00 (1st) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	6/28/00 (Chg) (1st)	

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(400)
 Change Request Log

CR Req#	Y	M	D	Time	Date Sent	Open & Address CR Target Date	Open & Assign CR (Est. Date)	Open & Assign CR (Act. Date)	Open & Assign CR (Target Date)	Review & Approv. (Target Date)	Rev. CR (Actual Date)	Rev. CR (Target Date)	Rev. CR (Actual Date)	Colored CR (Target Date)	Proposed CR (Target Date)	Proposed CR (Actual Date)	CR Mgt. Results (Target Date)	Doc. Chg. Mgt. Results (Actual Date)	Doc. Chg. Mgt. Results (Target Date)	Internal Change Mgt. Results (Actual Date)	Internal Change Mgt. Results (Target Date)	RFP (Actual Date)	RFP (Target Date)	RFP (Actual Date)	RFP (Target Date)	Rel. Pkg. (Actual Date)	Rel. Pkg. (Target Date)	Rel. Pkg. (Actual Date)	Rel. Pkg. (Target Date)	Rel. Imp. (Actual Date)	Rel. Imp. (Target Date)	Rel. Imp. (Actual Date)	Rel. Imp. (Target Date)	Doc. Changes (Actual Date)	Doc. Changes (Target Date)	Doc. Changes (Actual Date)	Doc. Changes (Target Date)	Notes	
20142	I	6		OHN Detect Issue 7 (7C BellSouth)	09/15/00	09/18/00	N/A	N/A	09/15/00	09/20/00		09/20/00																											9/20/00 - Validated as a defect to be targeted in a future release. 12/12/00 - implemented on 1/1/00 in an emergency release.
20193	I	6		TAG Hardware Software Upgrade to EMX 11.0 Platform (SD)	10/06/00	10/11/00	N/A	N/A	10/12/00																													7/15 / 5.0.2 (Rev 7) Scheduled for Rel 8.0.3 on 12/16/00. TAG 2.3 (Issue 7) Scheduled for Rel 9.0 on 01/06/01. 12/18/00 - Implemented in 8.0.3 on 12/18/00.	
20194	I	6		Testing Interval Guide for Port Loop Control (A1&T)	10/09/00	10/10/00	N/A	N/A	10/09/00	10/13/00		10/18/00																										documentation deleted and will be corrected in the next update of the Interval Guide targeted for 12/20. 12/12/00 - Implemented in Interval Guide Update on 12/15/00.	
20226	I	6		Calculate Correct Due Date Intervals (SD)	11/20/00	11/22/00	N/A	N/A	11/20/00	11/28/00		11/29/00																										11/20/00 - Determined to not be a defect, however BellSouth will retest on "Rescheduled Feature" targeted for 1st CW 2001. 12/15/00 - S1 & S2 Loops will be fixed on 12/16/00 for TAG Release.	
20226	I	6		Incorrect Calculation of Due Date Intervals for P20142 (SD)	12/04/00	12/05/00	N/A	N/A	12/04/00	12/07/00		12/04/00																										12/16/00 - Determined to be a defect and will be corrected in TAG 7.5.0.2 with is targeted for 12/16/00. 12/18/00 - Implemented in Rel. 8.0.3 on 12/16/00.	
20293	C	6		OS/90 Ordering Subsystem (A1&T)	05/03/00	05/04/00	N/A	N/A	05/04/00	05/09/00		05/08/00																										7/19 - Waiting on customer to notify if request can be closed. 12/18/00 - Closed by originator.	
20265	C	6		Add LENS 5.3 Tutorial (Technology)	06/20/00	06/22/00	06/21/00	06/21/00	06/21/00	06/28/00	N/A	N/A	6/21/00	See Notes	12/17/00																						Originator requested to have CS on hold until AT&T to submit a defect due to the problems encountered in testing. System changes have been made and AT&T will verify if changes have corrected the		
20156	C	6		Connect Direct Request (A1&T)	09/12/00	09/13/00	N/A	N/A	09/12/00	09/18/00		09/18/00																											
20240	PC	6		LENS file for each PCN on SLS system (SD)	06/11/00	06/22/00	N/A	N/A	06/10/00	06/22/00	06/25/00	06/25/00																										6/25 - Pending Classification Status.	
20074	V	6		End User Address in error for Rel Typ C, ACT of C (SD)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00		06/13/00																										6/7 - Determined to be a defect and is targeted for a future release.	

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> **Change Control Statuses** >>

Implemented Change Requests 1999 - 2000

Date Title

December 2000

12/18/2000 CR0236 - Incorrect Calculation of Due Date Intervals for PIC/LPIC
 12/18/2000 CR0226 - Calculate Correct Due Date Intervals
 12/18/2000 CR0193 - TAG Hardware/Software upgrade to UNIX 11.0 Platform
 12/12/2000 CR0211 - Different Information displayed on TAG than LENS
 12/12/2000 CR0194 - Missing Interval Guide for Port/Loop Combos
 12/11/2000 CR0216 - NPORD Date for FOC (Issue 7)
 12/11/2000 CR0230 - NPORD Defect
 12/11/2000 CR0219 - Due Date Intervals for LNP with Loop (REQTYP BB)
 12/11/2000 CR0091 - Add DFDT to the FOC
 12/11/2000 CR0068 - Pipe Cross USOC
 12/08/2000 CR0131 - Split Billing Requests

November 2000

11/21/2000 CR0224 - Invalid error message on REQTYP M for Line class of Svc
 11/21/2000 CR0214 - Documentation error on 2 wire UNE-P Bus/Res/PBX document
 11/20/2000 CR0204 - LESOG Not Processing REQTYP JB/ACT=A Correctly
 11/20/2000 CR0203 - LESOG Should Allow Manual Handling Instead of Auto-Clarifying
 11/20/2000 CR0045 - Strip Non-Resellable USOCs
 11/20/2000 EDI020900_001 - Electronically Order Routing to OS/DA
 11/14/2000 CR0162 - OTN Defect Issue 7
 11/14/2000 CR0148 - LESOG not recognizing disposition of addl/foreign listing
 11/14/2000 CR0136 - Address validating in LENS but not in TAG - Old RSAG
 11/14/2000 CR0126 - LESOG not pulling the correct CFN number for enhanced MMC
 11/14/2000 CR0108 - Listings over the number of 2 not shown on LSR or order
 11/14/2000 CR0073 - LEO not pulling Ported Number on FOC/CN
 11/14/2000 CR0024 - LOCNUM = HT = TN not found on CSR or LSR

October 2000

10/27/2000 CR0191 - Suppress the premise visit indicator
 10/27/2000 CR0188 - Release 7.1 Caused Defects
 10/26/2000 CR0205 - Listing Order Defect
 10/23/2000 CR0150 - Add NPT Data Element to the ESDQ Query
 10/23/2000 CR0147 - Seasonal Suspend

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10/16/2000 CR0187 - LESOG should recognize street directional for validation
10/16/2000 CR0167 - Incorrect Circuit # on FOC
10/16/2000 CR0163 - LESOG should not bring over FIDS on line USOCs
10/16/2000 CR0109 - GA 912/229/478 NPA Splits
10/10/2000 CR0134 - TN Reservation Display of Switch CLLI
10/10/2000 CR0106 - Delay Sunset of LSOG 2 XDSL Ordering via Fax
10/06/2000 TAG011700_001 - Migration As Specified for OSS99
10/06/2000 CR0125 - Change order to add a VCA and RJ11C in LENS
10/06/2000 CR0124 - LESOG to cancel N&D if unsuccessful in generating both
10/06/2000 CR0102 - NUM = TELNO = ACCT is Final Reject
10/06/2000 CR0089 - TN Reservation via LENS
10/06/2000 CR0081 - LESOG Populating incorrect due date interval
10/09/2000 CR0061 - Implement NC Overlay for 704/980
10/09/2000 CR0060 - Implement Kentucky NPA Split (606/859)
10/02/2000 CR0153 - Electronic Ordering of CO Based Line Sharing
10/02/2000 CR0129 - LESOG Failing to apply ZRTI to Orders
10/02/2000 CR0118 - Remove Housenumprefix for TAG API 2.2.0.10
10/02/2000 CR0116 - Premise Visit Indicator
10/02/2000 CR0115 - Partial Pre-Order Query Due Date Calculation
10/02/2000 CR0112 - Conversion As Is-ACT W Defect
10/02/2000 CR0159 - Documentation Discrepancies in BBR-LO Issue 9G
10/02/2000 CR0117 - Update TAG Issue 7 Map Due Date Calculation Tables

August 2000

08/29/2000 CR0092 - DFDT & CHC
08/29/2000 CR0077 - Subscription Version Cancellations
08/29/1999 LSR0623990001 - Workflow Mechanization
08/22/2000 CR0119 - LESOG Auto-Clarifying NUM=TELNO=TN not in CRIS
08/22/2000 CR0047 - Display Enhanced MemoryCall Access Number in LENS
08/16/2000 EDI0812990001 - EDI Ordering for Unbundled xDSL Loops
08/16/2000 TAG0812990002 - Pre-Order Loop Inquiry
08/14/2000 CR0076 - Generate Port Side of Order when Adding Line
08/14/2000 CR0075 - LESOG is Clarifying for 1MBFE in Error
08/14/2000 CR0071 - ECKKT data on FOC/CN
08/14/2000 OSS011300_001 - Migration as Specified for OSS99
08/07/2000 CR0084 - TAG 2.2.0.8 Security Exception Error Defect
08/03/2000 CR0062 - ReqTyp P/TOS 2nd Char of E

July 2000

07/28/2000 CR0067 - Call Return Invalid with Class of Service USOC UEPRX
07/12/2000 CR0022 - Flow Through Matrix

June 2000

06/17/2000 CR0060 - Implement Kentucky NPA Split (606/859)
06/16/2000 CR0084 - TAG Unknown Security Exception Types

May 2000

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05/23/2000 CR0054 - Versioning Defect 5.23.00

05/07/2000 CR0006 - YPQTY WPQTY

April 2000

04/30/2000 CR0007 - VER Field on Rejected LSRs for LNP

04/29/2000 CR0019 - ECCKT Defect

04/18/2000 CR0024 - Hunt Group Defect on a Separate CSR

04/18/2000 CR0011 - LENS Directory Defect

04/15/2000 CR0026 - NC Code not populating on Tag Loop Order

March 2000

03/23/2000 CR0004 - Line Class of Service

03/01/2000 CR0001 - Room Field Defect

February 2000

02/03/2000 ALL020900_002 6 - Character Yellow Page Heading (YPH) Code

1999

12/1999 TAG0907990001 - TAG Pre-Order Doc Enhancements

08/12/1999 LE0812990001 - Error Code List Note Modification

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Date Title

December

12/18/2000 CR0247 - Reduce Due Date Interval from 5 to 4 days for SL1 in TAG
 12/18/2000 CR0246 - LENS/TAG - Ability to view resold/UNE-P CSRs
 12/18/2000 CR0245 - LENS/TAG/EDI Manual vs Mechanized Notification
 12/18/2000 CR0229 - Enhance Address Validation in LENS/TAG to Allow Creating New LOC
 12/18/2000 CR0225 - Notes Added to the LACT Field in the BBR
 12/18/2000 CR0215 - UNE to UNE Bulk Migrations
 12/14/2000 CR0244 - Establish Standard Call Center Measurements 7 Reports for LCSC
 12/14/2000 CR0243 - Class of Service
 12/12/2000 CR0221 - Allow User To Populate LQTY in Lens
 12/12/2000 CR0242 - Invalid TNs on CSR Defect
 12/12/2000 CR0241 - CN returned on incorrect LSR version
 12/12/2000 CR0240 - LENS Line Class of Service Defect
 12/12/2000 CR0239 - LENS Quality of Service Defect
 12/12/2000 CR0238 - Provide Separate E-Mail Notification Lists for System Outages
 12/12/2000 CR0237 - Modify Due Date calculation mod to process RECTYP M as UNE
 12/12/2000 CR0236 - Incorrect calculation of Due Date intervals for PIC/LPIC
 12/12/2000 CR0233 - RORD field in LEO listed as unused
 12/12/2000 TAG8120003 - Parsed CSR
 12/11/2000 CR0218 - EDI Map Change for Error Text
 12/11/2000 CR0201 - Extension of the retirement of TAG 3.1.1.1
 12/11/2000 CR0186 - Interactive Agent TCIP/SSL
 12/11/2000 CR0177 - Support Value="D" for Response Type Request (RTR) TAG
 12/11/2000 CR0143 - Notification - MDR (Mechanized Disaster Reports)
 12/08/2000 CR0015 - ACT of C - Change Basic Class of Service
 12/08/2000 CR0014 - Change LENS Screen-"Number of Features to Add/Change/Delete"
 12/05/2000 CR0183 - TAG to display TTRA in IDENT Section for Number Pooling
 12/05/2000 CR0014 - Change LENS Screen on Features/Services Section
 12/04/2000 CR0235 - Notification to CLECS When A Number Has Been Posted in Error
 12/04/2000 CR0234 - Connect Direct Fix

12/04/2000 CR0232 - Alteration to Business Rules
 12/04/2000 CR0183 - TAG display the TTRA in unfiled IDENT Section
 12/01/2000 CR0228 - Provide Business Rules for REQ TYP M and E, ACT TYP T

November

11/27/2000 CR0223 - LENS ACT of V Defect
 11/21/2000 CR0227 - Stop auto-clarifying on REQ TYP M from Resale acct w/MAN FID
 11/21/2000 CR0226 - Calculate Correct Due Date Intervals
 11/21/2000 CR0223 - LENS ACT of V Defect
 11/20/2000 CR0222 - Unknown USOCS
 11/20/2000 CR0209 - Changes to CCP User Registration Form
 11/20/2000 CR0078 - Extended Loops (EELS)
 11/20/2000 CR0003 - RPON Flow-Through & Electronic Reject
 11/20/2000 EDI1215990001 - TN vs RSAG Validation
 11/16/2000 CR0207 - Extension of TAG 3.1.1.1 Sunset Date
 11/13/2000 CR0218 - EDI Map Change for Error Text
 11/13/2000 EDI030300_001 - CLEC Test Environment
 11/10/2000 CR0184 - Lens-Ability to View Resold CSR's
 11/08/2000 CR0213 - LENS/LCSC discrepancies on Directory Listings
 11/08/2000 CR0211 - Different information displayed on TAG than LENS
 11/08/2000 CR0210 - LENS generating an error on LNA=G when OTN is populated
 11/08/2000 CR0208 - TAG 2.2.x not processing Digital Loop Orders
 11/08/2000 EDI1215990001 - TN vs RSAG Validation
 11/07/2000 CR0176 - Allow PIC & LPIC to be Submitted as "No Change"
 11/07/2000 TAG0812990001 - Provide CFA via Pre-Order
 11/06/2000 CR0201 - Extension of the Release of TAG 3.1.1.1
 11/06/2000 CR0196 - Allow Changes in Directory Deliveries - LENS99

October

10/27/2000 CR0190 - RSAG Address vs. CSR Address
 10/27/2000 CR0130 - LESOG not responding to "C" order adding line & features
 10/27/2000 CR0110 - LESOG not populating ZNEA & ZNHC on ACT of N or C
 10/27/2000 CR0050 - LENS 6.3 - # of directories for white & yellow pages
 10/27/2000 CR0181 - Add Grid Values for Disconnect Nbr Field in TAG
 10/27/2000 CR0180 - API Reference Guide Recommendations-CLEC Notif
 10/27/2000 CR0179 - TAG Navigator to CORBA Bridge
 10/27/2000 CR0178 - Provide Solicitated Notifications in TAG
 10/26/2000 CR0206 - LNP Qualifier Defect
 10/24/2000 CR0040 - Order Tracking Request
 10/24/2000 CR0038 - TOS Field on ReqTyp J
 10/24/2000 CR0029 - Partial Migration of UNE Loops
 10/24/2000 CR0016 - SI Enhancement for SL1, SL2, DS0, DS1 and ISDN
 10/24/2000 CR0002 - Pre-Order/Order Business Rule Discrepancies
 10/24/2000 EDI0812990007 - Use of LEAN/LEATN Fields
 10/24/2000 EDI0812990005 - Handling of Remaining Service
 10/24/2000 EDI0812990004 - Change Main Account Number
 10/23/2000 CR0194 - Missing Interval Guide for Port/Loop Combos (UNE-P)

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10/23/2000 CR0151 - Error Code Defect
 10/23/2000 CR0135 - Merging of Accounts
 10/16/2000 CR0165 - Discrepancies in BellSouth Guidelines - LNUM Field on Loop Service Page
 10/16/2000 CR0143 - Notification of Mechanized Disaster Reports
 10/12/2000 CR0198 - Increase Transaction Size Limit
 10/10/2000 CR0197 - Remove LOCNUM from LNA Charts in the BBR-LO
 10/09/2000 CR0104 - Lens Large Account Inquiry
 10/06/2000 CR0020 - View Multiple CSRs Simultaneously
 10/05/2000 CR0139 - Update TAG API to Better Relate to Pre-Order Rules
 10/05/2000 CR0053 - Improvements to the BBR-LO
 10/05/2000 CR0160 - Flow Through for ReqTyp BB, ACT P & Q for Loop w/LNP
 10/05/2000 CR0149 - Modify & Resend FOCs & Clarifications
 10/05/2000 CR0137 - Flow Through for ReqTyp CB, ACT P & Q for LNP
 10/05/2000 CR0096 - LENS Enhancement - Add New Listings
 10/05/2000 CR0088 - Mech of Unbundled Network Terminating Wire (UNTW)
 10/05/2000 CR0085 - Web-based LSR
 10/05/2000 CR0031 - Ability to Change Listing Account in LENS
 10/04/2000 CR0171 - Baseline Change Control Document
 10/03/2000 CR0127 - Provide Pending Service Order for CSR via TAG
 10/03/2000 CR0113 - LENS Inquiry - View Customer Record
 10/03/2000 CR0101 - EDI Pre-Ordering

September

09/28/2000 CR0152 - Electronic Ordering of Payphone Service Orders
 09/28/2000 CR0146 - Default the Listed TN
 09/28/2000 CR0145 - Remove a Tn from a LENS LSR
 09/28/2000 CR0144 - Add LSR Codes in LENS
 09/26/2000 CR0166 - Cable ID Defect
 09/25/2000 CR0169 - Number Conservation Rules for Number Pooling
 09/25/2000 CR0030 - UNE to UNE Migrations
 09/18/2000 CR0158 - Already pending error message on LSRs
 09/18/2000 CR0157 - Need to handle HTG USOCs for all calling plans on Port/Loop Combos
 09/12/2000 CR0132 - Fielded Completion
 09/07/2000 CR0133 - Migration OF UNE-P
 09/07/2000 CR0105 - Drop the RES ID Requirement For xDSL Order
 09/04/2000 CR0154 - Missing Completion Notices Defect

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August

08/28/2000 CR0142 - Remove business reference for RCFRE, RCFRF, RCFRG, RCFRN in LEO-IG
 08/17/2000 CR0128 - Loop/Port Combo for Res/Bus Lines
 08/09/2000 CR0080 - LESOG Failing to issue Port Loop Combo correctly

July

07/28/2000 CR0100 - TAG Failing to accurately calculate Due Dates on Deny/Restor
 07/28/2000 CR0111 - UNE Cannot Generate Class of Svc. USOC Error

07/17/2000 CR0099 - Order MA'd and Service Order Info Deleted

07/17/2000 CR0098 - Re-Calculate Due Date Intervals

June

06/29/2000 CR0012 - TAFI Functionality via ECTA Interface

06/27/2000 ORD030200_001 - UNE VIA ASR21

06/20/2000 CR0079 - TAG Requiring INIT on ReqType A

06/20/2000 CR0074 - TAG Requiring enduser address in error

May

05/19/2000 CR0049 - LENS TNs on Bulk Orders

April

January

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> Cancelled Change Requests >>

December 2000

- 12/18/2000 CR0156 - Connect:Direct Request
- 12/12/2000 CR0065 - LENS 6.3 Tutorial
- 12/11/2000 CR0217 - CSR With 888 USOC

November 2000

- 11/27/2000 CR0231 - Inability to view order statuses for UNE-P Conversions in CSOTS
- 11/16/2000 CR0192 - Pre-Order/Firm Order Data Element Inconsistencies-TCIF 9
- 11/15/2000 CR0059 - 45 day TN Reservation
- 11/14/2000 CR0212 - Response on Size Limitation Limit
- 11/14/2000 CR0202 - Sup to Cancel Defect Request
- 11/14/2000 CR0185 - TAG/COF Lead Project Mgr Role Change Request
- 11/14/2000 CR0175 - TAG CLEC Test Environment Application Support
- 11/14/2000 CR0174 - CR LOG - Reference to Application and Release Number
- 11/14/2000 CR0173 - Tables in BBR-LO Ref Applicability to TAG Releases
- 11/14/2000 CR0023 - OSS'99 Ordering Guidelines
- 11/14/2000 CR0008 - YPQTY/WPQTY (Iss 7) REQTP E Reject Code must be 2 numerics

October 2000

- 10/27/2000 CR0093 - Electronic Change Notifications
- 10/25/2000 CR0095 - ECTA-Attribute Validation
- 10/16/2000 CR0123 - LENS Application Enhancement
- 10/16/2000 CR0107 - Documentation Defect
- 10/16/2000 CR0070 - Call Forwarding USOC Defect
- 10/16/2000 CR0066 - Invalid USOC for Basic Class of Service / CREX7/TN
- 10/16/2000 CR0051 - LENS application defect
- 10/16/2000 CR0039 - FOC not populating order number on Port Order
- 10/16/2000 CR0018 - USOC Segmentation Request
- 10/10/2000 CR0087 - "C" Order Process for UNE-P
- 10/09/2000 CR0138 - Fielded Completion Notices
- 10/09/2000 CR0027 - Displaying Directory Information on FOC
- 10/09/2000 CR0044 - LENS Application Enhancement
- 10/06/2000 ORD032700_001 - Post-FOC Clarification
- 10/06/2000 CR0155 - Ringmaster Defect
- 10/06/2000 CR0121 - Discrepancies in BellSouth Guidelines - CG LSOR-002
- 10/06/2000 CR0120 - SOCS RT60 Invalid NPA NXX for Routing Sub 001
- 10/06/2000 CR0114 - TN Reservation Defect

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10/06/2000 CR0103 - Disconnect of Port Loop Combo going into RECYCLE
10/06/2000 CR0097 - LENS Defect
10/06/2000 CR0072 - LEO not pulling BAN1 from the SO
10/06/2000 CR0013 - Date Sent/Century Defect (EDI)
10/06/2000 CR0056 - Invalid Sup, Subscription version defect

September 2000

09/11/2000 CR0033 - EDI Multiple ReqTyp Enhancement
09/07/2000 CR0140 - Update the Due Date Calculation Tables

August 2000

08/04/2000 CR0046 - EDI Reject Process Modification
08/01/2000 CR0052 - WSOP Field Requirements

July 2000

07/28/2000 EDI0812990002 - Pre-Order Digital Loop Qual, EDI & TAG
07/28/2000 EDI0812990006 - Mechanization of XDSL Loops
07/28/2000 SOTO11200_001 - Remarks Section Added to Svc. Order Tracking System
07/28/2000 TAG030900_001 - LNA of V Functionality - Pre OSS'99
07/28/2000 EDI030200_001 - Modify Line Activities to Align with Industry Guidelines
07/28/2000 CR0005 - TAG Pre-Order Test
07/28/2000 CR0009 - Expand CLLI Code in the AVQ in TAG Pre-Order
07/28/2000 CR0010 - TAG Pre-Order unstable results
07/28/2000 CR0017 - Invalid TOS
07/28/2000 CR0025 - Clarification on ATN Usage Rules
07/28/2000 CR0028 - LSO2 & LSO4 Differences
07/28/2000 CR0032 - TR Reservation
07/28/2000 CR0034 - Act. Code "T" (EUMI Field)
07/28/2000 CR0035 - One Page Sup for DD Changes
07/28/2000 CR0036 - Transfer of Call Options - INP REQTYP B
07/28/2000 CR0037 - Introduction of AIN Internet Call Waiting
07/28/2000 CR0041 - Documentation of Interface Changes and Releases
07/28/2000 CR0042 - Open IWBAN Field on the EU Form
07/28/2000 CR0043 - Conversion As-Is Error - Invalid USOC
07/28/2000 CR0048 - Fields that cannot be changed on a Supp.
07/28/2000 CR0057 - EDI Issue 9 PON Cancelled on Port/Loop Combo
07/28/2000 CR0058 - Fraud Management Process
07/28/2000 CR0063 - Memory Call-Forwarding Number
07/28/2000 CR0069 - Reserving Telephone Numbers
07/28/2000 CR0083 - Customer Service Record Error Message
07/28/2000 CR0086 - EELS via ASR
07/28/2000 CR0094 - TAG6015VAL REFNUM=CFA FORMAT INVALID
07/28/2000 CR0103 - Disconnect of Port/Loop Combo into RECYCLE

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(4/29) Change Request Log

CR No	CR Title	CR Desc	CR Type	CR Status	CR Category	CR Sub-Category	CR Priority	CR Impact	CR Risk	CR Effort	CR Cost	CR Start	CR End	CR Due	CR Assign	CR Owner	CR Manager	CR Approver	CR Status	CR Reason	CR Comments	CR Notes
3007	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3008	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3009	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3010	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3011	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3012	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3013	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3014	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3015	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3016	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3017	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00
3018	1. 5. NRI on Requested	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00	4/1/00

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(4/00)
Change Request Log

CR Log #	CR #	CR Title	Open Date	Open Yrs/CR (Date)	Open Yrs/CR (Date)	Open Yrs/CR (Date)	Open Yrs/CR (Date)	Review CR For Accpt. (Range Date)	Rev CR For Accpt. (Classification Date)	Rev CR For Accpt. (Clar. Date)	Rev CR For Accpt. (Status Date)	Cancel CR (Date)	Propose to Close (Target Date)	Reason for CR (Actual Date)	CR Mgr. (Actual Date)	Doc Chg. Result (Target Date)	Doc Chg. Signoff (Actual Date)	Released Change Signoff (Actual Date)	Released Change Signoff (Actual Date)	RPM (Actual Date)	Rel Pkg. Notify (Target Date)	Rel Pkg. Notify (Actual Date)	Rel Imp. (Actual Date)	Self Rel. (Actual Date)	Self Rel. (Actual Date)	Doc. Changes (Target Date)	Doc. Changes (Actual Date)	Doc. Updates (Only Maint. (Actual Date)	Doc. Updates (Only Maint. (Actual Date)	Notes		
00109	1	GA 919/239/478 NPA Split (BST)	07/13/00	07/13/00	N/A	N/A	07/18/00	08/15/00	N/A	N/A	08/11/00																					
00113	1	Conversion Ans ACD W Defect (Southern Telecom)	07/27/00	07/28/00	N/A	N/A	07/27/00	08/01/00			07/28/00																					imp w/Rel. 7.2 on 10/14/00
00115	1	Partial Pre-Order Query DOC (BST)	07/28/00	08/02/00	N/A	N/A	07/31/00	08/28/00	N/A	N/A	08/11/00																					Implemented with Rel. 7.1 on 9/30/00
00116	1	Premise Vtd Indicator (BST)	07/28/00	08/02/00	N/A	N/A	07/31/00	08/28/00	N/A	N/A	08/11/00																					imp w/Rel. 7.1 on 9/30/00
00117	1	ISDona Issue 7 Map Dva Date Collection Tables w/infor from SST Products & Services (enhance) (Guala) (BST)	07/28/00	08/02/00	N/A	N/A	07/31/00	08/28/00	N/A	N/A	08/11/00																					imp w/Rel. 7.1 on 9/30/00
00118	1	Remove Housenumbers for (VCA AD-2.2.0.10) (BST)	07/31/00	08/01/00	N/A	N/A	07/31/00	08/03/00			08/03/00																					Rel 7.0 - Validated as a defect corrected in Release 7.1 9/30/00
00119	1	ESOC Auto-clearing NUM=TELECOM not in rds (BST)	07/28/00	07/31/00	N/A	N/A	07/31/00	08/03/00			08/03/00																					9/30/00 - Validated as a defect to be corrected in Release 7.0
00124	1	ESOC to Cancel N & D functionality in Existing (BST)	08/04/00	08/07/00	N/A	N/A	08/06/00	08/29/00			08/09/00																					8/30/00 - Determined to be a defect and was corrected in Release 7.0
00126	1	ESOC to Cancel N & D functionality in Existing (BST)	08/04/00	08/08/00	N/A	N/A	08/04/00	08/09/00			08/09/00																					8/30/00 - Determined to be a defect and will be corrected in a future release. N/A. 9/25/00 - Implemented in Rel. 7.0 9/30/00
00128	1	ESOC to Cancel N & D functionality in Existing (BST)	08/04/00	08/09/00	N/A	N/A	08/04/00	08/09/00			08/09/00																					8/30/00 - Determined to be a defect and will be corrected in a future release. N/A. 11/13/00 - Implemented in Rel. 7.0 on 9/12/00
00129	1	ESOC testing to copy DRI to orders (BST)	08/14/00	08/15/00	N/A	N/A	08/14/00	08/17/00			08/17/00																					8/30/00 - Determined to be a defect and will be corrected in a future release. N/A. 9/30/00 - Corrected in Rel. 7.1 9/30/00
00131	1	Spot Billing Requests (BST)	08/15/00	08/18/00			08/15/00	09/13/00			09/08/00																					Implemented with the 13/01/00 BSR-LO 0018/00 guidelines dated 10/16/00 to the HELPU! NMS section of the BellSouth Pre-Order Business Rules agreement to further clarify the BellSouth 9/18/00 - Determined to be a defect and will be corrected in a future release. N/A. 11/13/00 - Implemented in Rel. 7.1 on 9/25/00
00134	1	IN Reservation display of switch CUI (ATB)	09/09/00	09/14/00	N/A	N/A	09/14/00	09/12/00			09/15/2000																					Implemented with the 13/01/00 BSR-LO 0018/00 guidelines dated 10/16/00 to the HELPU! NMS section of the BellSouth Pre-Order Business Rules agreement to further clarify the BellSouth 9/18/00 - Determined to be a defect and will be corrected in a future release. N/A. 11/13/00 - Implemented in Rel. 7.1 on 9/25/00
00135	1	Address violating in LENS but not in TAG ignoring old ESAG history (BST)	09/15/00	09/16/00	N/A	N/A	09/15/00	09/18/00			09/18/00																					Implemented with the 13/01/00 BSR-LO 0018/00 guidelines dated 10/16/00 to the HELPU! NMS section of the BellSouth Pre-Order Business Rules agreement to further clarify the BellSouth 9/18/00 - Determined to be a defect and will be corrected in a future release. N/A. 11/13/00 - Implemented in Rel. 7.1 on 9/25/00



(4/05)
 Change Request Log

CR Log #	S. #	Title	Date Sent	Open & Validate CR (Orig. Date)	Open & Validate CR (Clerk Sent Date)	Open & Validate CR (Clerk Rec'd Date)	Open & Validate CR (Mgmt. Date)	Review CR (Orig. Accpt. Date)	Rev CR for Approval (Orig. Accpt. Date)	Rev CR for Approval (Clerk Rec'd Date)	Rev CR for Approval (Mgmt. Date)	Cancel CR (Orig. Date)	Prepare for CRM (Orig. Date)	Prepare for CRM (Actual Date)	CE Mgt. Action	Doc Chg. Rev. Mgt. (Orig. Date)	Doc Chg. Review Mgt. Results (Actual Date)	Internal Change Mgmt. (Target Date)	Internal Change Mgmt. (Actual Date)	PRM (Actual Date)	Est. Pkg. No./Yr. (Target Date)	Est. Pkg. No./Yr. (Actual Date)	Est. Pkg. No./Yr. (Target Date)	Est. Pkg. No./Yr. (Actual Date)	Soft Rel. No./Yr. (Target Date)	Soft Rel. No./Yr. (Actual Date)	Doc. Changes (Target Date)	Doc. Changes (Actual Date)	Doc. Updates Only (Target Date)	Doc. Updates Only (Actual Date)	Notes		
0032000	001	Modify Line Activities to Align with Industry Guidelines (A181)	3/2/00	N/A	N/A	3/3/00				4/19/00 (See Notes)		06/26/00																				4-19-00 Provided BSI response to originator for review. 4-20-00 1st level Escalation in progress. 4-25-00 provided BSI response to 1st level escalation. 5-01-	
0032000	001	LNA Functionality of V-line (2889) (quest)	3/6/00	N/A	N/A	3/10/00						3/29/00																				4-28-00 Rec'd cancellation notice/escalation from originator	
000032000	001	Post-FOC Clarification (A181)	03/23/00	03/24/00	N/A	N/A	03/27/00	04/21/00		4/19/00 (See Notes)		09/27/00																				4-19-00 Provided BSI response to originator for review. 4-20-00 1st level Escalation in progress. 4-25-00 provided BSI response to 1st level escalation. 8-1-	
00005	005	TAG Pre-Order Testing Environment (PIC Delistcom)	03/27/00	03/30/00	N/A	N/A	03/29/00					07/00																				4-7-00 Issue Resolved by Originating CLEC	
00008	008	REQUIRE "E" reject codes (W/RTN) must be 2 numerics or blank (PIC Delistcom)	04/17/00	04/18/00	04/17/00	04/17/00	04/17/00	04/20/00	N/A	N/A	N/A	10/27/00																				4-25 Aspect in progress 10/25/00 Originator requested 4-28-00 BSI provided response to originator for review. 5-18-00 Originating CLEC advised change request could be closed.	
00009	009	REQUIRE "E" reject codes (W/RTN) must be 2 numerics or blank (TAG) from B AIN to 11 (AIN Gen)	04/12/00	04/16/00	N/A	N/A	04/17/00	05/15/00	N/A	N/A	N/A	05/22/00																					CANCEL
00010	010	TAG Pre-Order Linearity Results (PIC Delistcom)	04/17/00	04/20/00	N/A	N/A	04/17/00					04/19/00																				4-19-00 Referred to ECS to report originator is service.	
00013	013	Date Sent/ Century Default (PIC Delistcom)	04/20/00	04/21/00	N/A	N/A	04/21/00	04/26/00	N/A	N/A	N/A	04/26/00	05/26/00																			4-26-00 Provided validation results to originator. 9/8/00 - Request cancelled by originator.	
00017	017	Invoice TOS (A181)	04/27/00	04/28/00	N/A	N/A	04/28/00	05/03/00				05/04/00																				5-28-00 Provided BSI response to originator for review. 5-30-00 Add'l error requested. 7-21 BSI provided add'l info to originator.	
00018	018	USOC Segmentation Request (A181)	04/27/00	05/02/00	N/A	N/A	04/28/00	05/24/00	N/A	N/A	N/A	05/24/00 (See Notes)	08/23/00																				
00025	025	Clarification on AIN Usage Billing (PIC Delistcom)	05/27/00	05/28/00	N/A	N/A	05/27/00	06/20/00				06/16/00																					6-16-00 Documentation Clarification only.
00027	027	POC on the line CR does not show listing order. only flag info (request closed)	05/03/00	05/05/00	N/A	N/A	05/05/00	06/16/00	N/A	N/A	N/A	07/10/00																					6-20-00 Reviewed BSI response to originator for review.
00028	028	Document USOC 2 & USOC 4 Differences (PIC Delistcom)	05/08/00	05/11/00	N/A	N/A	05/08/00	06/16/00	N/A	N/A	N/A	07/26/00																					6-8-00 Provided BSI response to originator for review.
00032	032	IN Resubmission (Spint)	05/09/00	05/12/00	N/A	N/A	05/09/00	06/07/00	05/11/00			06/23/00																					6-23-00 Cancelled by originator.



Change Request Log

CR Log #	IS	Title	Date Sent	Open/Valid CR (Target Date)	Open/Valid CR (Start)	Open/Valid CR (Stop)	Open/Valid CR (Actual Date)	Review CR for Accept. (Target Date)	Rev CR for Accept. (Actual Date)	Rev CR for Accept. (Target Date)	Rev CR for Accept. (Actual Date)	Concur CR (Target Date)	Implement CR (Target Date)	Review for CR (Actual Date)	CR (Target Date)	Doc Chg Review (Target Date)	Doc Chg Review (Actual Date)	Intend Change (Target Date)	Intend Change (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Pkg (Actual Date)	Soft Rel (Target Date)	Soft Rel (Actual Date)	Doc Change (Target Date)	Doc Change (Actual Date)	Doc Update (Target Date)	Doc Update (Actual Date)	Notes
00033	C	EO Multiple Reauth Enhancement (BST)	05/09/00	05/17/00	N/A	N/A	05/10/00	05/08/00	05/02/00	07/31/00	N/A	06/11/00																		6/24/00 Pending Classification 7/31/00 CR Resp Rec'd. New Review CR for Acceptance Date is 8/14/00. 8/14/00 BST response to originator for review.
00034	C	ACT code 1* (EUM Field) (BST)	05/15/00	05/15/00	N/A	N/A	05/17/00	05/08/00	N/A	N/A	06/02/00	05/16/00																		6-16-00 Documentation classification only.
00035	C	One Page SUP for DD Changes (BST)	05/10/00	05/15/00	N/A	N/A	05/10/00	05/05/00	N/A	N/A	06/02/00	05/16/00																		6-16-00 to be included in a future CR
00036	C	Transfer of Call Capabilities (BST)	05/10/00	05/15/00	N/A	N/A	05/10/00	05/05/00	N/A	N/A	05/06/00	05/16/00																		6-16-00 Documentation classification only.
00037	C	AIN Internet Call Waiting (BST)	05/10/00	05/15/00	N/A	N/A	05/15/00	05/14/00				05/15/00																		6-16-00 New product release 6/16/00 Target date changed due to classification requested. 05/16/00 BellSouth responded to CLEC and CSW that CR is not a defect. Waiting on
00039	C	Documentation of Interface Changes (BST)	05/12/00	05/28/00	N/A	N/A	05/28/00	05/17/00	05/05/00	05/12/00	05/16/00	05/28/00																		6-16-00 Verbal agreement from originator to cancel request
00041	C	Open IMBAN list on the 53 form (BST)	05/11/00	05/16/00	N/A	N/A	05/11/00	05/09/00	N/A	N/A	05/09/00	05/16/00																		6-16-00 Verbal agreement from originator to cancel request
00042	C	Open IMBAN list on the 53 form (BST)	05/10/00	05/15/00	N/A	N/A	05/15/00	05/14/00	05/12/00	05/14/00	05/16/00	05/28/00	6/19/00	6/19/00	6/28/00															7/8 - Originator has notified BellSouth that defect can be repaired
00043	C	Conversion As-is LENS 6.3 Invalid USOC for Basic Class of Svc (One Point)	05/15/00	05/16/00	N/A	N/A	05/15/00	05/15/00				07/29/00																		6-16-00 Pending Classification
00044	C	LENS Colofore Due Date Enhancement (BST)	05/15/00	05/18/00	N/A	N/A	05/15/00	05/14/00				07/29/00																		6-16-00 Pending Classification
00046	C	EDI Select Process Modification (BST)	05/17/00	05/22/00	N/A	N/A	05/22/00	04/25/00	N/A	N/A	06/09/00 (See Notes)	05/24/00																		6-4-00 BST response to originator for review. 6-19-00 1st level escalation in progress. 6-25-00 BST response to 1st level. 6-27-00 2nd level escalation. 7-19-00 BST
00048	C	Fields that can not be changed on a SUPP (BST)	05/22/00	05/25/00	N/A	N/A	05/22/00	05/20/00				05/14/00																		6-16-00 Documentation classification only.
00050	C	LENS 6.3 - # of Microtones for white & yellow responses (BST)	05/19/00	05/22/00	N/A	N/A	05/19/00	05/22/00	N/A		05/22/00	05/23/00																		5/22 - Not a defect, but will be entered in a feature to be targeted for a future release. 3/03 - Cancelled by Originator.
00051	C	LENS 6.3 - external service detach for routing IDs (BST)	05/15/00	05/22/00	N/A	N/A	05/19/00	5/26/00	8/16/00 (Rev)	05/25/00	07/19/00	05/11/00																		7/19 - Reclassified as a feature, to be reviewed for acceptance

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Change Request Log (400)

CR Log #	S	F	Title	Date Sent	Open A Y/N	Open B Y/N	Open C Y/N	Open D Y/N	Open E Y/N	Review CR for Accept (Target Date)	Rev CR for Accept (Rec'd Date)	Rev CR for Accept (Rec'd Date)	Rev CR for Accept (Rec'd Date)	Cancel CR (N/A) Date	Reopen CR (N/A) Target Date	Reopen CR (N/A) Target Date	Reopen CR (N/A) Target Date	CR Mgr (Actual Date)	CR Rev. Mgr (Actual Date)	Doc Chg Review Mgr (Actual Date)	Internal Change Request (Actual Date)	Internal Change Request (Actual Date)	SPM (Actual Date)	Rel Prog (Actual Date)	Rel Prog (Actual Date)	Rel Prog (Actual Date)	Self Rel (Actual Date)	Self Rel (Actual Date)	Doc Changes (Actual Date)	Doc Changes (Actual Date)	Doc Updates (Actual Date)	Doc Updates (Actual Date)	Notes
30052	C	A	WSP Prod Requirements Regarding EDI Type B (One Bean)	05/10/00	05/20/00	N/A	N/A	05/19/00	06/20/00	N/A	N/A	06/09/00 (See Notes)	08/07/00																			6-9-00 Provided BS response to originator for review.	
30056	C	A	WSP Subsystem Version Defect (A187)	05/23/00	05/24/00	N/A	N/A	05/24/00	05/24/00			05/24/00	09/28/00																			5-26-00 Determined to be a training issue. Pending feedback from originator 9/28/00. Completed by engineer.	
30057	C	A	Port/Loop Combo Conversion (A78)	05/23/00	05/24/00	N/A	N/A	05/24/00	05/24/00																							7/19 - Originator has notified Bellsouth that defect can be cancelled.	
30058	C	A	SPM Management Process (A187)	05/24/00	05/30/00	N/A	N/A	05/30/00	06/27/00	N/A	N/A	6/29/00 (See Notes)	06/26/00																			6-29-00 BS response to originator. Originator's reply received on 6/29/00. Effective date changed to 12/00. Determined to not impact CLEC IN reservations.	
30059	C	A	IN Reservation Changed to 45 Days (85)	05/25/00	06/01/00	N/A	N/A	06/25/00					11/18/00																				
30063	C	A	Incorrect Call Forwarding Number given for Memory Call in LENS (Newline)	05/30/00	06/01/00	N/A	N/A	06/01/00	06/01/00				07/26/00																				7/27 - Originator has notified Bellsouth that defect can be cancelled.
30066	C	A	Invalid USOC for Basic Class of Svc. Format SAE 434 # CRX7/IN (A187)	06/01/00	06/02/00	N/A	N/A	06/01/00	06/01/00			06/01/00	09/26/00																				Feature will be opened and targeted for Rel. 7.0. 7/31 - A change in the rate database is needed to complete this change. 8/1 - CRX7 is not valid for UNE's and will not be coded to rate database. 8/8 - Invalidated doc defect. 8/10 - work not provided by CLEC. 9/26/00 Originator
30069	C	A	Reserving Telephone numbers (A187)	06/04/00	06/07/00	N/A	N/A	06/06/00	06/06/00				06/13/00																				7/19 - Originator has cancelled change request.
30070	C	A	Call Forwarding USOC Defect (A187)	06/01/00	06/02/00	N/A	N/A	06/01/00	06/01/00				06/13/00																				7/19/00 Originator's defect is not valid with the FD provided. Working on originator to close out 8/28/00. Cancelled by Originator.
30072	C	A	FCO should pull BANI from Svc Order & return on the FQCC (N 85)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00				06/13/00																				8/14 - Defect was corrected in Release 6.4 on 6/17. Originator has cancelled change request.
30083	C	A	CR Error (Advanced Tab)	06/14/00	06/15/00	N/A	N/A	06/14/00	06/19/00				06/15/00																				7/27 - Originator has notified Bellsouth that defect can be cancelled.
30085	C	A	BELS via ASP (WSPCom)	06/14/00	06/19/00	N/A	N/A	06/14/00	07/17/00				06/25/00																				6-26-00 Combined with CR0030200_001 (A187) and (WSPCom). CR originally submitted as a type A. Defect was corrected with Rel 6.4 re: IN to order. 10/26/00 Bellsouth returns to correct CLEC 09/29/00 CLEC system?
30087	C	A	"C" Order process for UNEP (Sect)	06/15/00	06/20/00	N/A	N/A	06/15/00	6/28/00	N/A	N/A	6/28/00	7/17/00																				

Administrative Section

CCNA	PON	VER	DSRNO	ATN	AN
SC1	SC2	PG	OF		

Listing Control Section

LACT	ALI	RTY	LTY	TT	STYC	TOA	DOI	WPP	LOCNUM	DLNUM	MTN	PPTN
DDQTY	LTXQTY											

Listing Indicators Section

DML	NOSL	TMKT	BRO	ADV	STR	DLNM	PROF	DIRIDL	DIRNAME	
DIRSUB								LID1	LID2	OMSD
OMSD (continued)										

Listing Instruction Section

LTN	NSTN	OMTN	LEX	DNA	LNPL	LNLN
LNLN (continued)						①
						②

LNFN (continued)	DES

TL	TITLE1	TITLE2	NICK	PLA

PLA (continued)	LTXNUM	LTXTY	LTEXT

LTEXT (continued)

LTEXT (continued)

LTEXT (continued)

ADI	LAPR	LANO	LASF	LASD	LASN

LATH	LASS	LALO

LALOC	LAST	LAZC

Pate

LNFN ③ Ronald

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-----Original Message-----

From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Tuesday, December 05, 2000 5:48 PM
To: bhamilton@idstelcom.com; bwellman@idstelcom.com;
david.burley@wcom.com; generalg@cris.com; Jane.Hunter@mail.sprint.com;
Mae.Means@mail.sprint.com; rlthompson@xo.com; ronald.l.thompson@xo.com;
sangelo@bellsouth.net; SLively@trivergent.com; Tyra.Hush@wcom.com;
wolfsbrg@cris.com
Subject: Tentative Parsed CSR Implementation Schedule

Tentative.txt

Parsed CSR Sub Team,

Attached is the tentative implementation schedule for the Parsed CSR change request. We are working to better the dates if at all possible.

We plan to have the responses to the outstanding action items to you by no later than Friday, December 8.

Just a reminder to let us know by Wednesday, December 6 if you concur with the updated requirements we distributed on 11/21 or if you have any questions/comments. The final CLEC Parsed CSR requirements will be shared with the CLEC community for feedback once the Sub Team has completed their review.

Please let me know if you have any questions.

Thanks,

Cheryl Storey
Change Control Team
205-321-2113



**TENTATIVE PARSED CSR
IMPLEMENTATION TIMELINE**

ACTIVITY	TENTATIVE SCHEDULED DATE(s)	ACTUAL COMPLETION DATE
CLEC Requirements Developed	10/3/00 - 11/20/00	11/20/00
CLEC Requirements Completed	11/20/00 - 12/6/00	
CLEC Requirements Distributed to CLEC Community	12/7/00 - 12/8/00	
Planning & Analysis Phase	11/27/00 - 04/10/01	
Internal Kick-off Meeting	11/27/00 - 12/1/00	11/27/00
- Project Team P&A	11/27/00 - 12/29/00	
Requirements Phase	11/27/00 - 04/10/01	
Internal Requirements Developed	11/27/01 - 03/30/01	
- User Requirements	01/02/01 - 02/19/01	
- User Requirements BLR	02/20/01	
- System Requirements	2/21/01 - 04/09/01	
Internal Requirements Baselined	04/10/01	
Design Phase	04/11/01 - 06/18/01	
Construction Phase	06/19/01 - 10/01/01	
Internal Testing Phase	10/02/01 - 12/01/01	
Internal Testing	10/02/01 - 11/30/01	
Internal Implementation	12/1/01	
External Testing Phase	12/3/01 - 12/28/01	
Process Implementation	12/31/01	
Project Closeout	01/31/02	

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ORDER

In re: Performance Measurements For Telecommunications Interconnection, Unbundling
And Resale

BY THE COMMISSION:

This matter comes before the Georgia Public Service Commission ("Commission")
to establish generic performance measurements for BellSouth Telecommunications, Inc.,
for interconnection, unbundling and resale and to establish appropriate enforcement mechanisms
for those performance measurements.

I. INTRODUCTION

A. Background

This Commission first held hearings in this docket in November 1997, and has required
BellSouth to submit performance reports since May 1998. The purpose of these reports was to assist the
Commission and the parties in determining whether BellSouth provides nondiscriminatory service to
CLECs. BellSouth's Service Quality Measurements ("SQM") originated in 1998 as the result of the
Commission's decision in Docket No. 7892-U. Since the Commission issued its order in May 1998, the
Federal Communications Commission ("FCC") has stated more definitively its requirements for an
adequate performance measurement plan. In addition, the parties have had the time to observe the
Georgia plan in action, test its effectiveness, and identify many of its strengths and weaknesses.

The Commission initiated this phase of this Docket with a Procedural and Scheduling Order
issued on June 8, 2000. The Scheduling Order stated that the purpose of this proceeding was to
establish performance measurements, and to establish appropriate enforcement mechanisms for those

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performance measurements, for telecommunications interconnection, unbundling and resale. Given the more extensive experience available since the 1997 hearings, the Commission initiated this new phase to refine and upgrade the set of performance measures so that it will more clearly reveal whether BellSouth is adequately opening its market to competition on a nondiscriminatory basis and to adopt a complete remedies plan that will provide adequate consequences should BellSouth fail to meet the standards.

Hearings were held before the Commission on July 5-7, 2000. Briefs were filed by BellSouth and the CLEC Coalition (AT&T Communications of the Southern States, Inc., Broadslate Networks, Inc., DIECA Communications, Inc. d/b/a Covad Communications Company, ICG Telecom Group, Inc. and Intermedia Communications, Inc., ITC^DeltaCom Telecommunications, Inc., MediaOne Telecommunications of Georgia, LLC., NewSouth Communications Corp., Rhythms Links, Inc., The Southeastern Competitive Carriers Association, US LEC Corp., WorldCom, Inc., and Z-Tel Communications, Inc.).

B. Jurisdiction

The Commission has general authority and jurisdiction over the subject matter of this proceeding, conferred upon the Commission by Georgia's Telecommunications and Competition Development Act of 1995 (Georgia Act), O.C.G.A. §§46-5-160 *et seq.*, and generally O.C.G.A. §§ 46-1-1 *et seq.*, 46-2-20, 46-2-21, and 46-2-23. Under the Federal Telecommunications Act of 1996 (Federal Act), State Commission's are also authorized to set terms and conditions for interconnection and access to unbundled elements pursuant to Sections 251 and 252 of the Federal Act.

II. FINDINGS AND CONCLUSIONS

There are three basic parts to a comprehensive performance plan: An appropriate set of performance measurements; an appropriate set of benchmarks and retail analogs to apply to those measurements; and, a remedy plan to ensure compliance with the performance goals.

A. Performance Measures.

A well-defined, effective and meaningful set of performance measurements is essential in order to provide the Commission with the information necessary to assess BellSouth's service to CLECs. This includes comparative measurements that monitor all areas of support, *i.e.*, pre-ordering, ordering, provisioning, collocation, maintenance and repair, operator services, directory assistance, E911, trunk group performance, and billing. Measurements and appropriate methodologies must be documented in detail so that clarity exists regarding what will be measured, how it will be measured, and in what situations a particular event may be excluded from monitoring. Measurement results must be sufficiently disaggregated so that only the results for similar operational conditions are compared and so that the results will not mask discrimination.

1. BST Proposed SQM

BellSouth has proposed a set of SQM to the Commission. BellSouth's SQM covers 9 different functional categories including: Pre-ordering; ordering; provisioning; maintenance and repair; billing; operator services and directory assistance; E911; trunk group performance; and, collocation. Coon, Tr. at 99. BellSouth states that each of these categories corresponds to a function on which BellSouth's performance to CLECs should be measured. Within each of these functional categories BellSouth proposes a series of measurements. Each measurement is broken down into 10 categories including: The measurement itself; a definition of the measure; any exclusions to the measure; business rules; levels of disaggregation; a calculation of the measurement; report structure; data retained relating to CLEC experience; data retained relating to BST experience; and, retail analog/benchmark. Coon, Tr. at 100. BellSouth asserts that these 10 categories provide all of the information necessary to understand the measurement, analyze the result of the measurement, and assess performance against the retail analogue or benchmark. BellSouth states that the format of the SQM is comparable to that of both the Bell Atlantic plan and the Southwestern Bell plan. Coon, Tr. at 100-01.

BellSouth states that in addition to adopting BellSouth's current SQM, the Commission should adopt the five additional measurements that BellSouth is in the process of adding to the SQM. The five additional measures are:

- (1) Service Inquiry with Firm Order (Manual);
- (2) Loop Makeup Inquiry (Manual and Electronic);
- (3) Timeliness of Change Management Notice;
- (4) Percent Functional Acknowledgments Returned On Time; and,
- (5) Percent Troubles Within 7 Days of a Hot Cut.

In addition, BellSouth has added a measure for Hot Cut Timeliness Percentage Within Interval and Average Interval (P-6A, BST Ex. 1) to the SQM. BellSouth also states that it is in the process of adding additional levels of disaggregation to the current SQM to break out xDSL loops, ISDN unbundled loops, and line sharing. Coon, Tr. at 107. Finally, BellSouth states that it has revised its Trunk Blockage Report. BellSouth Exhibits 1 and 2; Coon, Tr. at 150.

After considering BellSouth's proposal and the testimony and arguments presented in this matter, the Commission hereby approves the use of BellSouth's proposed SQM as modified below in Table 1. Any of BellSouth's proposed SQMs not listed below and not otherwise addressed in this order are approved.

TABLE 1

BST Proposed SQMs	Commission Determination
Service Inquiry with Firm Order (Manual)	Adopt BST SQM: Benchmark: 95% returned within 5 business days.
Loop Make Up Inquiry (Manual and Electronic)	See Table 2 for Average Response Time to LMU Information (Manual and Electronic).
Timeliness of Change Management Notices and Documentation	Adopt this BST SQM. 30 days after this order Change Management Team shall file with the Commission the interval to include in this measure.
Percent FAs Returned On Time	See Table 2 for Acknowledgment Timeliness.
Percent Troubles Within 7 days of a HOT CUT.	Adopt BST SQM.
OSS-1 Avg. Response Time and Response Interval	Adopt this SQM with the following Business Rule change: The response interval starts when the client application (LENS or TAG for CLECs and RNS for BST) submits a request to the legacy system and ends when the appropriate response is returned to the client application.
P-1 Percent Flow Through Service Request	Adopt this SQM with the following addition: Add the following measure to the flow-through report: <u>BellSouth Achieved Flow-Through</u> <u>Issued Service Orders</u> Total Mech. LSR's- [(Auto Clarify)+(CLEC fallout)] x 100 The Commission includes the current CLEC Error Excluded Calculation in the VSEEM III Plan. BST and the CLECs shall form an Improvement Task Force. This Task force shall jointly prepare an implementation report, that includes implementation target dates to eliminate the high BellSouth Caused Failures and the designed manual fallout for electronically submitted LSR's. This report shall be filed with the Commission 3 months after the date of this Commission Order. BST is ordered to resume reporting its retail business flow-through results and provide data back to May of 2000.
O-6 Reject Interval	Adopt this SQM with the following amendments: Fully Mechanized: The elapsed time form receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in EDI, TAG OR LENS). Auto Clarifications are considered in the Fully Mechanized Category.

	Partially Mechanized: The last sentence should read: "The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via (LENS, EDI or TAG)."
O-7 FOC Timeliness	The stop time is meant to represent the time that BST actually returns the FOC to the CLEC.
O-9 LNP- Percent Rejected Service Requests O-10 LNP- Reject Interval Distribution & Average Reject Interval O-11 LNP- FOC Timeliness Interval Distribution & FOC Average Interval P-10 LNP Missed Installation Appointments P-2 Average Jeopardy Notice Interval & % of Orders Given a Jeopardy Notice P-5 Average Completion Notice Interval P-11 LNP Disconnect Timeliness P-12 LNP Total Service Order Cycle Time P-5 Average Completion Notice Interval	These measures should not exclude Non-Mechanized LSRs.
	Adopt the SQM with the following change: Business Rules: The start time is the completion time stamp either by the field technician or the SPM due date stamp; the end time is the time stamp the notice is transmitted to the CLEC Interface (LENS, EDI or TAG).
P-8 Total Service Order Cycle Time	Adopt the SQM with the following changes: Definition: This report measures the total service order cycle time from receipt of a valid service order request to the return of a completion notice to the CLEC interface. Business Rules: This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval. This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG or EDI).
MR-3 Maintenance Average Duration	Adopt the SQM with the following Change: Exclusions: Delete Trouble Reports greater than 10 days.
P-9 Service Order Accuracy	Adopt the SQM with the following Change: Benchmark: 95% Accurate
C-1 Average Response Time	Adopt with the following changes: Definition: Measures the average time (counted in calendar days) from receipt of a complete and accurate collocation application (including receipt of application fees) to the date BellSouth responds in writing. Within 10 calendar days after

	<p>having received a bona fide application for physical collocation, BellSouth must respond as to whether space is available or not.</p> <p>Level of Disaggregation: Caged/Cageless shall be added.</p> <p>Benchmark:</p> <p><u>Now</u> Virtual- 20 Calendar Days Physical- 30 Calendar Days Caged/Cageless- 30 Calendar Days</p> <p><u>6 Months</u> Virtual- 10 Calendar Days Physical- 20 Calendar Days Caged/Cageless- 20 Calendar Days</p>
C-2 Average Arrangement Time	<p>Adopt with the following changes:</p> <p>Definition: Measures the average time from receipt of a complete and accurate Bona Fide firm order (including receipt of appropriate fee) to the date BST completes the collocation arrangement and notifies the CLEC (counted in calendar days).</p> <p>Level of Disaggregation: Caged/Cageless shall be added</p> <p>Benchmark:</p> <p>Virtual: 50 Calendar Days (Ordinary) 75 Calendar Days (Extraordinary)</p> <p>Physical/Caged: 90 Calendar Days</p> <p>Cageless: 60 Calendar Days (Ordinary) 90 Calendar Days (Extraordinary)</p>
C-3 Percent Due Dates Missed	<p>Adopt with the following changes:</p> <p>Level of Disaggregation: Caged/Cageless shall be added</p> <p>Benchmark: 95% on time</p>

2. Additional CLEC Proposed SQM

The CLEC Coalition argues that BellSouth's SQM are inadequate and do not meet the needs of CLECs and the Commission to evaluate the local market. The CLEC Coalition states that the BellSouth plan lacks many key measures and has proposed that thirty-nine additional performance measurements be added to BellSouth's SQM. Emch Dir. Ex. 1; Emch Rebuttal Ex. 4.

The CLEC Coalition states that a comparison of the measures included in the Texas and New York plans approved by the FCC demonstrates the inadequacies of the measures currently provided by BellSouth. More than 70% of the New York measures are missing from the BellSouth SQM. Emch Dir. Ex. 2. Similarly, 48 of the measures in the Texas plan are not included in BellSouth's SQM. Emch Dir. Ex. 3. The deficiencies in BellSouth's proposal include: Loop hot cuts; software issues; xDSL pre-ordering; ordering and provisioning; change management; data base accuracy and timely updates; order status completeness; and, billing completeness. Emch Rebuttal 3. The CLEC Coalition argues these are significant shortcomings, not minor issues, as BellSouth has contended.

The Commission agrees that some, but not all, of the CLEC Coalition's proposed additional SQM should be adopted. After considering the CLEC Coalition's additional proposed SQM and the testimony and arguments presented in this matter, the Commission hereby approves the use of the following additional measures as set forth below in Table 2.

TABLE 2

CLEC SQM PROPOSALS	COMMISSION DETERMINATION
Average Response time for LMU information (MANUAL)	<p>A) Disaggregation: ADSL, HDSL, Other DSL and Line Sharing.</p> <p>B) LMU Information: BST shall deliver all the information it has on the makeup of the loop. This list may be updated pending the outcome of Docket 11900-U</p> <p>C) Benchmark 95% in 3 business days</p>
Average Response time for LMU information (ELECTRONIC): EDI, TAG, LENS & RoboTAG.	<p>A) Disaggregation: ADSL, HDSL, Other DSL and Line Sharing.</p> <p>B) LMU Information: BST shall deliver all the information it has on the makeup of the loop. This list may be updated pending the outcome of Docket 11900-U.</p> <p>C) Benchmark</p>

	<p>90% within 5 minutes. 6 months – 95% within 1 minute.</p>
Acknowledgment Timeliness (ELECTRONIC)	<p>A) Functional Acknowledgment Response Interval</p> <p>Definition: The correct start time is the receipt time of the LSR at BellSouth's side of the interface (gateway). The end time is when the acknowledgment is transmitted by BellSouth at BellSouth's side of the interface (gateway).</p> <p>B) Exclusions: none</p> <p>C) Benchmark: 6 Months EDI- 90% within 30 minutes. 95% within 30 minutes. TAG- 95% within 30 minutes.</p>
Acknowledgment Completeness (Fully Mechanized, Partially Mechanized and Total Mechanized)	<p>A) Percent of Functional Acknowledgments Returned.</p> <p>Definition: This measurement provides the percent of LSRs received via EDI or TAG, which are acknowledged electronically.</p> <p>B) Exclusions: none</p> <p>C) Benchmark: 100% Returned</p>
Firm Order Confirmation and Reject Response Completeness.	<p>Adopt the CLEC SQM.</p> <p><u>Deletions:</u> Business Rules: Everything after and including ILEC Results. Calculation –Multiple or Differing FOC/Reject Responses. Level of Disaggregation: Volume Benchmark: 95 % Returned</p>
Timeliness of Response to Request for BST- to CLEC Trunks Mean Time to Provide Response % Within 7 days % Negative Responses	<p>DO NOT ADOPT AT THIS TIME.</p> <p>Please provide the Commission with the BellSouth's detailed process for Trunk Augmentation.</p>
Percent Completion/ Attempts without notice or with Less than 24 hours notice.	<p>Adopt the CLEC SQM. Do not report by MSA. Benchmark: DIAGNOSTIC</p>
Percent Service Loss for Early Cuts Percent Service Loss for Late Cuts	<p>DO NOT ADOPT AT THIS TIME.</p> <p>ADOPT BST MEASURE P-6A. Coordinated Customer Conversion- Hot Cut Timelines % within Interval and Average Interval.</p>
Percent Orders Canceled or Supplemented at the request of the ILEC.	<p>DO NOT ADOPT AT THIS TIME.</p>

Percent of Coordinated Cuts Not Working as Initially Provisioned.	DO NOT ADOPT AT THIS TIME. THIS INFORMATION WILL BE CAPTURED IN BST PROPOSED PROVISIONING TROUBLES WITHIN 7 DAYS OF HOT CUT COMPLETION.
Average Recovery Time for Coordinated Cuts	Adopt the CLEC SQM with the following deletions or additions: 1) Exclusion: add Cutovers where service disruptions are due to end-user or CLEC caused reasons. 2) Delete the business rule For ILEC Results. 3) Delete BST Aggregate 4) Delete MSA and Volume Category. 5) This measure is Diagnostic.
Mean Time to Restore a Customer to ILEC Percent of Customers Restored to ILEC	DO NOT ADOPT AT THIS TIME.
Cooperative Acceptance Testing (What percentage of xDSL Loops are tested)	Adopt the following measure: Title: % of cooperative testing attempts for xDSL lines to cooperative line tests requested. Definition: The loop will be considered cooperatively tested when the BellSouth tech places a call to the CLEC representative to initiate cooperative testing and jointly perform the test with the CLEC. Exclusions: a) xDSL lines requested for testing by the CLEC but the CLEC contact number is incorrect or the CLEC representative is not available or not ready for testing. b) xDSL lines of CLEC who do not request cooperative testing. Business Rules: When a BellSouth tech finishes delivering an xDSL Loop at the customer premise, he is to call a toll free number to the CLEC's testing center. The tech and the CLEC rep. at the center then test the line. As an example of the type of testing performed, the testing center may ask the tech to put a short on the line, so that the center can run a test to see if it can identify the short. Calculation: (Total number of successful xDSL cooperative test for xDSL lines where cooperative testing was requested)/ (Total number of xDSL line tests requested by the CLEC and scheduled in the reporting period. Report Structure: CLEC Aggregate CLEC Specific

	<p>Specific as to the loop type</p> <p>Level of Disaggregation: Region State ADSL HDSL UCL Other DSL</p> <p>Benchmark: 95% of requested lines tested.</p>
Percent Completion of Loop Modification/Conditioning on xDSL Loops.	<p>DO NOT ADOPT AT THIS TIME.</p> <p>The time to perform loop modification/conditioning is included in the Order Completion interval for the xDSL Loops.</p>
Percent Billing Errors Corrected in X Days	DO NOT ADOPT AT THIS TIME.
Usage Timeliness	DO NOT ADOPT AT THIS TIME.
Recurring and Non-recurring Charge Completeness	<p>Adopt CLEC SQM</p> <p>BST has 90 days to put this measure into production.</p>
Percent On-Time Mechanized Local Services Invoice Delivery.	DO NOT ADOPT AT THIS TIME.
Meantime To Notify CLEC of Network Outages	<p>Adopt the CLEC SQM with the following deletions:</p> <p>Level of Disaggregation: Delete By Switch and Tandem.</p> <p>Retail Analog/ Benchmark: Parity by design.</p>
Average Database Update Interval Percent Database Update Accuracy NXX and LRN(s) Loaded by LERG Effective Date	Adopt CLEC SQM
Notification of Interface Outages	Adopt CLEC SQM.
Timeliness of Change Management Notices Timeliness of Final Versions of Documents Associated w/ Change Average Delay Days for Notices Average Delay Days for Documentation	Adopt the BST SQM of Timeliness of Change Management Notice with Average Delay Days. 30 days after this order Change Management Team shall file with the Commission the interval to include in this measure.
% ILEC vs. CLEC Changes Made Accuracy of Change Notices Percent Software Certification Failures Software Problem Resolution Timeliness Software Problem Resolution Avg. Delay Days	DO NOT ADOPT AT THIS TIME.
Percent Response Commitments Met (On-Time)	DO NOT ADOPT AT THIS TIME.
Percentage of Request Processed within 30 Business Days (TX)	<p>Adopt CLEC SQM with following change:</p> <p>Exclusions: Excludes weekends and holidays</p>

Percentage of Quotes provided for Authorized BFR/Special requests Within X (10, 30, 60) days. (TX)

Adopt the CLEC SQM with the following changes.

Exclusions: Requests that are subject to pending arbitration.
Retail analog/Benchmark: Change calendar days to business days.

3. Performance Measurements Audit

BellSouth states that its proposed audit policy provides the Commission and the CLECs with adequate audit opportunities to ensure that the data used to measure performance is reliable. BellSouth's Audit Policy states as follows:

If requested by a Public Service Commission or by a CLEC exercising contractual audit rights, BellSouth will agree to undergo a comprehensive audit of the aggregate level reports for both BellSouth and the CLEC(s) for each of the next five (5) years (2000-2005), to be conducted by an independent third party. The results of that audit will be made available to all parties subject to proper safeguards to protect proprietary information. This aggregate level audit includes the following specifications:

1. The cost shall be borne 50% by BellSouth and 50% by the CLEC or CLECs;
2. The independent third party auditor shall be selected with input from BellSouth, the PSC, if applicable, and the CLEC(s);
3. BellSouth, the PSC and the CLEC(s) shall jointly determine the scope of the audit."

BST Ex. 2, Appendix C. Moreover, BellSouth states that it provides the CLECs with the raw data underlying many of the SQMs as well as a user manual describing how to manipulate the data into reports. Coon, Tr. at 162. The CLECs can use this raw data to validate the results in the SQM reports posed every month on the BellSouth website. Id.

Sprint has requested an audit mechanism that would include "mini-audits" of individual measurements. See Lenihan Rebuttal, at 2-5. BellSouth argues that Sprint's proposal is unworkable and would place an unreasonable burden on BellSouth for little incremental gain over the value of BellSouth's proposed yearly audit.

The Commission adopts BellSouth's audit proposal with the following change: Revise "(2000-2005)" in the Audit Policy to read "(2001-2005)." The Commission does not adopt the

Sprint proposal.

B. Benchmarks and Retail Analogs.

Analogs and benchmarks are the measuring sticks of a good performance measurements plan. As described by CLEC Coalition witness Emch:

A retail analog is service or function that BellSouth provides for itself, its customers or its affiliates that is analogous to a service or function that BellSouth provides to CLECs. When a BellSouth retail analog exists, BellSouth's performance for itself, its customers and its affiliates should be compared to its performance for CLECs to determine if BellSouth is meeting The Act's parity requirement. If no retail analog exists, BellSouth's performance must be gauged by a performance standard, also known as a benchmark.

Emch Dir. 24. The CLECs argue that benchmarks should be established based on a level of performance that will allow CLECs to compete, not simply on BellSouth's historical performance. Where BellSouth provides service to its affiliate that is superior to the service provided to its retail operations, the CLECs argue that comparisons should be made between performance for CLECs and performance for the BellSouth affiliate. The CLEC Coalition proposes the analogs and benchmarks set forth in Exhibit 7 to Ms. Emch's Rebuttal Testimony, as clarified for xDSL loops by Exhibit A to the CLEC Coalition's Brief.

BellSouth argues that the Commission should adopt the retail analogs and benchmarks set forth in BellSouth Exhibit 2 (DAC-2). BellSouth states that each analog and/or benchmark will provide the Commission with the information it needs to assess BellSouth's performance with respect to the CLEC community. BellSouth states that its current set of proposed analogs and benchmarks are based on collaborative work between BellSouth and the CLECs in the Louisiana performance measurement workshops, as well as on input from KPMG and the Commission and its Staff during the Georgia OSS testing and performance measurement audit. Coon, Tr. at 110. BellSouth states that, in large part, its proposed analogs and benchmarks mirror those established by the Commission in its July 5, 2000 Order in Docket No. 8354-U. BellSouth states, however, that there are certain analogs and benchmarks that the Commission should amend from the 8354-U Order. These analogs and benchmarks are as follows:

- (1) Business and UNE Flow-Through;
- (2) Average Response Time;
- (3) Reject Interval (Electronic);
- (4) Average Disconnect Timeliness Interval for LNP;
- (5) Average Arrangement Time for Collocation Orders; and,
- (6) FOC and Reject Intervals for Interconnection Trunks.

After considering the testimony and arguments presented in this matter, the Commission

hereby approves the benchmarks and retail analogs set forth below in Table 3. The Commission does not adopt the CLEC proposal that where BellSouth provides service to its affiliate that is superior to the service provided to its retail operations, comparisons should be made between performance for CLECs and performance for the BellSouth affiliate. If a CLEC believes that BellSouth is showing preference to its affiliate, however, the CLEC may file a complaint with the Commission. See, e.g., O.C.G.A. §§ 46-5-163(d) and 46-5-169(6).

TABLE 3

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
<u>PRE-ORDERING</u>	<u>Percent Response Received within "X" Seconds (LENS & TAG)</u> Customer Service Record Due Date Availability Address Validation Product and Service Availability Telephone No. Availability	Parity
	<u>Service Inquiry with Firm Order (Manual)</u>	95% in 5 business days
	<u>Loop Makeup Inquiry (Manual)</u> ADSL HDSL UCL Other DSL Line Sharing	95% in 3 business days
	<u>Loop Makeup Inquiry (Electronic: EDI, TAG and LENS)</u> ADSL HDSL UCL Other DSL Line Sharing	90% in 5 minutes 6 months after going into production 95% in 1 minute
	<u>OSS Interface Availability (All Systems)</u>	99.5%
<u>ORDERING</u>	<u>Acknowledgment Timeliness (Electronic)</u>	EDI: 90% in 30 mins. TAG: 95% in 30 mins. <u>6 months</u> EDI: 95% in 30 mins.
	<u>Acknowledgment Completeness (Fully Mechanized, Partially Mechanized & Total Mechanized)</u>	100% Returned
	<u>Percent Flow Through Service Request</u> Resale Residence Resale Business UNE LNP	95% 90% 85% 85%
	<u>Percent Rejected Service Request (Mechanized, Partially Mechanized & Non-Mechanized)</u>	Diagnostic
	<u>Reject Interval (Mechanized)</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex	97% within 1hour

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE xDSL (ADSL, HDSL, UCL) Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations Local Transport UNE Other Non- Design UNE Other Design Local Interconnection Trunks	
	<u>Reject Interval (Partially Mechanized)</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE xDSL (ADSL, HDSL, UCL) Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations Local Transport UNE Other Non- Design UNE Other Design Local Interconnection Trunks	85% w/in 18 hours (3 months) 85% w/in 10 hours (6 months)
	<u>Reject Interval (Non- Mechanized)</u> (Same as above) Local Interconnection Trunks	85% within 24 hours 85% within 4 days
	<u>Firm Order Confirmation Timeliness</u> <u>Mechanized</u> <u>Partially Mechanized</u>	95% within 3 hours 85% w/in 18 hours (3 months)

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	<u>Non-Mechanized</u> Local Interconnection Trunks	85% w/in 10 hours (6 months) 85% within 36 hours 95% within 10 days
	<u>Firm Order Confirmation and Reject Response Completeness</u>	95% Returned
	<u>Speed of Answer in Ordering Center</u>	Parity with retail
<u>PROVISIONING</u>	<u>Mean Held Order Interval</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non-Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non-Design UNE Digital Loop < DS1 UNE Digital Loop >= DS1 UNE xDSL (ADSL, HDSL, UCL) UNE ISDN Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations UNE Combo Other Local Transport UNE Other Non-Design UNE Other Design Local Interconnection Trunks	Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Digital Loop < DS1 Retail Digital Loop >= DS1 ADSL provided to retail Retail ISDN- BRI ADSL provide to retail Retail POTS Retail POTS Retail POTS Retail Res. and Bus. (POTS) Retail Res. Bus & Design (Dispatch) Retail DS1/DS3 Interoffice Retail Res. & Bus. Retail Design Parity with retail
	<u>Percent Orders given Jeopardy Notice (Electronic)</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design	Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail Res. and Bus. Dispatch

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE Digital Loop < DS1 UNE Digital Loop >= DS1 UNE xDSL (ADSL, HDSL, UCL) UNE ISDN Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations UNE Combo Other Local Transport UNE Other Non-Design UNE Other Design Local Interconnection Trunks	Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 ADSL provided to retail Retail ISDN- BRI ADSL provide to retail Retail POTS Retail POTS Retail POTS Retail Residence and Business Retail Res, Bus & Design (Dispatch) Retail DS1/DS3 Interoffice Retail Res. & Bus. Retail Design Parity with retail
	<u>Order Completion Interval</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE Digital Loop < DS1 UNE Digital Loop >= DS1 UNE xDSL (ADSL, HDSL, UCL) UNE ISDN Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations UNE Combo Other Local Transport UNE Other Non-Design UNE Other Design	Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 7 bus days (w/o conditioning) 14 bus days (w/conditioning) Retail ISDN- BRI ADSL provide to retail Retail POTS Retail POTS Retail POTS Retail Residence and Business Retail Res, Bus & Design (Dispatch) Retail DS1/DS3 Interoffice Retail Res. & Bus. Retail Design

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	Local Interconnection Trunks	Parity with retail
	<u>Average Jeopardy Notice Interval (Electronic)</u> Same Disaggregation as above.	95% >= 48 hours
	<u>Percent Missed Installation Appointments</u> <u>Average Completion Notice Interval (Electronic)</u> <u>% Provisioning Troubles within 30 days</u>	Same analog and benchmarks as Held Orders
	<u>Total Service Order Cycle Time</u>	Diagnostic
	<u>Cooperative Acceptance Testing</u> ADSL HDSL UCL Other DSL	95% of requested lines tested
<u>MAINTENANCE & REPAIR</u>	<u>Missed Repair Appointments</u> <u>Customer Trouble Report Rate</u> <u>Maintenance Average Duration</u> <u>% Repeat Troubles within 30 days</u> <u>Out of Service > 24 hours</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2W Analog Loop Design 2W Analog Loop Non-Design UNE Switch Ports UNE Loop + Port Combo UNE Combo Other UNE xDSL (HDSL, ADSL & UCL) UNE ISDN UNE Line Sharing UNE Other Design UNE Other Non-Design Local Interconnection Trunks Local Transport	Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail POTS Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail POTS Retail Residence and Business Retail Res, Bus & Design (Dispatch) ADSL provided to retail Retail ISDN- BRI ADSL provide to retail Retail Res. & Bus. Retail Design Parity with retail Retail DS1/DS3 Interoffice
	<u>OSS Response Interval</u> TAFI (Front End) CRIS	Parity with retail Parity by design

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	DLETH DLR LMOS LMOSupd LNP MARCH OSPCM Predictor SOCS	
	<u>Average Answer time - Repair Center</u>	Parity with retail
<u>BILLING</u>	<u>Invoice Accuracy</u> <u>Mean time to Deliver Invoices</u> <u>Usage Data Delivery Timeliness</u> <u>Usage Data Delivery Completeness</u> <u>Mean time to Deliver Usage</u> <u>Recurring and Non-Recurring Charge Completeness</u>	Parity with retail
	Resale UNE Interconnection	Parity 90% 90%
<u>OPERATOR SERVICES</u>	<u>Average Speed to Answer</u>	Parity by design
	<u>% Answered in "X" Seconds</u>	Parity by design
<u>DA</u>	<u>Average Speed to Answer</u>	Parity by design
	<u>% Answered in "X" Seconds</u>	Parity by design
<u>E911</u>	<u>Timeliness</u> <u>Accuracy</u> <u>Mean Interval</u>	Parity by design
<u>LNP</u>	<u>Average Disconnect Timeliness</u>	95% within 15 minutes
<u>CUSTOMER COORDINATED CONVERSIONS</u>	<u>Coordinated Customer Conversions- UNE Loops w LNP</u> <u>Coordinated Customer Conversions- UNE Loops w/o LNP</u>	95% <= 15 minutes

*Exclude switch based orders. Separate for both (UNEs and Retail) orders that require only Central Office work from those that require fieldwork.

C. Remedies and Enforcement Plan.

The development of an effective performance measurement plan does not end with the establishment of a set of comprehensive, adequately defined measures, benchmarks and analogs. It also includes an appropriate remedies plan to provide incentives for BellSouth to meet the established benchmarks and analogs. The FCC identified five key characteristics of an effective enforcement plan:

1. Potential liability that provides a meaningful and significant incentive to comply with the designated performance standards;
2. Clearly articulated, pre-determined measures and standards, which encompass a comprehensive range of carrier-to-carrier performance;
3. A reasonable structure that is designed to detect and sanction poor performance when it occurs;
4. A self-executing mechanism that does not leave the door open unreasonably to litigation and appeal; and,
5. Reasonable assurances that the reported data is accurate.

BA NY Order, ¶ 433.

A well-developed remedies plan serves several important purposes. First, it promotes the initial development of competition by providing further incentive for BellSouth to allow nondiscriminatory access to its network. The ability to offer customers at least the same level of service that they would receive from BellSouth is critical to CLEC efforts to attract and retain customers. Second, once competition develops, self-enforcing penalties help to guarantee that BellSouth will continue to provide CLEC customers with the same quality service it provides to its retail customers. Third, where BellSouth does provide discriminatory or non-parity service to CLEC customers, penalties are paid to CLECs to partially defray the additional costs attributable to inferior service provided by BellSouth. Fourth, uncovering discriminatory service may lead to the discovery of underlying problems in BellSouth's systems and/or procedures. Once such problems are identified, penalties provide the incentive for BellSouth to address them head-on rather than to simply implement quick, short term fixes. Fifth, rather than waiting for problems to be discovered, the prospect of remedies for discriminatory performance will provide an incentive for BellSouth to take proactive steps to avoid providing poor quality performance to CLECs. Finally, adverse consequences for discriminatory behavior will discourage backsliding once BellSouth has attained approval to enter the interLATA market.

The object of a self-executing remedies plan is to avoid coming to the Commission to resolve disputes about poor performance. Self-executing remedies remove the delays and expense of pursuing litigation. As the FCC stated, an effective enforcement plan shall "have a self-executing mechanism that does not leave the door open unreasonably to litigation and appeal." BA NY Order ¶ 433.

BellSouth argues that the Commission should adopt BellSouth's proposed penalty plan, BellSouth's Voluntary Self-Effectuating Enforcement Mechanism (VEESM) proposal. BellSouth states that VEESM is based on key outcome-oriented measurements contained in the BellSouth SQM as well as the corresponding analogs and benchmarks and that it meets all five of

the key characteristics expressed by the FCC. The VSEEM Plan establishes a three-tiered schedule for penalties for non-performance. The three tiers are as follows:

- Tier-1 enforcement mechanisms are triggered when BellSouth fails on any one of the Tier-1 VSEEM measurements for a particular month and are paid directly to the individual CLECs;
- Tier-2 enforcement mechanisms are triggered when BellSouth fails at the CLEC aggregate level on any one of the Tier-2 VSEEM measurements in a calendar quarter. These payments would be made directly to the State;
- Tier-3 enforcement mechanisms are triggered when BellSouth consistently fails at the CLEC aggregate level on any 5 of the 12 Tier-3 VSEEM measurements for 3 consecutive months in a calendar quarter. Under Tier-3, BellSouth will voluntarily discontinue marketing long distance service in Georgia until such time as BellSouth's performance improves.

Coon, Tr. at 114. Moreover, BellSouth states, VSEEM recognizes that not all metrics are created equal and that some are more important to end users than others by offering greater remedies for certain measurements, such as UNE Installation Intervals, than others, such as OSS Response Interval. Coon, Tr. at 123. Also, the multi-tiered structure of the plan is designed to incent BellSouth to continue to provide service parity by creating escalating penalties for continuing violations. Coon, Tr. at 123.

In contrast to BellSouth, the CLECs recommend that the Commission adopt a remedies plan with a two tiered structure that measures: (1) the quality of support delivered to each individual CLEC (Tier 1), and (2) the quality of support delivered to the CLEC industry as a whole (Tier 2). For Tier 1 violations, BellSouth would pay penalties directly to the affected CLEC as compensatory damages. For Tier 2 violations, BellSouth would make payment directly to a governmental agency, to protect the public interest, as regulatory fines. Bursh Dir. 8. The dollar value of the consequences for both Tier 1 and Tier 2 violations depend on the severity of the violation.

All measures proposed by CLECs in the performance measurement plan are included in the CLECs proposed remedies plan. The CLECs argue that if a measure is important enough to be included in the performance measurement plan, then the plan must provide the incentive for BellSouth to meet the applicable analog or benchmark by including the measure in the remedies plan. The CLECs recommend the use of the modified z score as the appropriate statistical methodology. Where there is no retail analog to the service provided to CLECs and a benchmark has been established, BellSouth either passes or fails. Bursh, Direct 9. In either case, the monetary consequences increase with the severity of the violation

The CLECs argue that increasing penalties as the severity of the violation increases is appropriate because the more severe the violation, the more disruption and inconvenience experienced by CLECs and their customers. In addition, increasing the consequences as severity increases will encourage BellSouth

to provide the best service possible even if BellSouth recognizes that it will not meet a certain measure within a given month. Under the CLECs' remedy plan, Tier 1 violations would be assessed on a monthly basis and penalties for noncompliant performance would be paid directly to the CLEC that received the degraded service. Bursh, Direct 9. The CLEC plan addresses chronic performance failures by increasing the monthly penalty payment to the rate assessed for severe violations (\$25,000) beginning in the third month that a particular submeasure is violated. This additional payment would continue monthly until BellSouth complied with that measure. *Id.* at 11.

The CLECs state that payments for Tier 2 violations would be made to a state-designated fund. Bursh, Direct 12. Penalties for Tier 2 violations also would increase depending on severity, with parameters defined for those violations, which are market impacting, and those designated as market damaging or market constraining. In addition, a factor "n" would be applied as a multiplier to the basic penalty amount. The value of "n" would decrease as the CLEC market penetration increases. *Id.* at 13. Thus, the CLECs argue, the plan is devised to encourage BellSouth to open its market by reducing its exposure to penalties as it does so.

BellSouth states that the Commission should not adopt the CLECs' penalty plan because: Its Tier-1 remedies are unsubstantiated; it uses a per measure approach; it incorporates all of the CLECs' performance measures as opposed to a subset of key measures; it fails to incorporate a balancing critical value; it misuses the Z-statistic; it incorporates the wrong statistical test; and, it inappropriately bases BellSouth's liability on market share.

After considering the testimony and arguments presented in this matter, the Commission, using the provisions of the VSEEM plan as a starting point, hereby finds that the remedy plan shall be adopted with the following characteristic:

1. Truncated-Z Methodology using the balancing critical value.

BellSouth's VSEEM plan is based on a statistical methodology known as the "Truncated Z," a methodology invented by Dr. Colin Mallows of AT&T during a collaborative process in Louisiana. Mallows, Tr. at 950-51. The Truncated Z represents a significant enhancement to the LCUG version 1.0 modified Z methodology, the statistical methodology proposed by the CLECs. Mulrow, Tr. at 472. In general terms, the Truncated Z statistic is a summary of the results of many statistical comparisons made with like-to-like categories. These categories, or cells, are formed by sorting both CLEC transactions, and BellSouth retail analog transactions on such factors as service type, order type, time of month, and wire center. Mulrow, Tr. at 465. In each comparison cell, a "modified Z" type statistic is calculated. The form of the Z statistic may vary depending on the performance measure, but it should be distributed approximately as a standard normal "bell curve" with a mean zero and a standard deviation of one.

One of the keys of the Truncated Z methodology, which the CLECs' proposed methodology lacks, is the ability to balance Type I and Type II errors. A Type I error occurs when the statistical test decision rule indicates that BellSouth is favoring its own customers when it is not. A Type II error, on the other hand, occurs when the statistical test decision rule indicates BellSouth is not

favoring its own customers when in fact, it is. Mulrow, Tr. at 467. The concept of "balancing" is crucial because if the methodology balances, it will ensure that the two error probabilities are equal and neither the ILEC nor the CLEC is unfairly prejudiced. Mulrow, Tr. at 468. The formula to balance the critical values depends on the materiality factor of "delta," the number of BellSouth transactions, and the number of CLEC transactions. Id.

The Commission adopts the Truncated-Z Methodology using the balancing critical value.

2. Effect 45 days from issuance of order.

BellSouth maintains that remedies should only be adopted to prevent backsliding once BellSouth has entered the long distance market. Yet avoiding backsliding is only one of the purposes served by a remedies plan. By delaying adoption of a penalty plan until BellSouth enters the long distance market, the Commission would forego the opportunity to enable more rapid development of competition. At the hearing, many CLECs testified that they are currently experiencing problems with the quality of service they are receiving from BellSouth. These problems could make it more difficult for CLECs to attract and retain customers. An appropriate penalty plan will further encourage BellSouth to provide nondiscriminatory service during the critical early stages of competition, while providing some compensation to CLECs for the additional costs they incur when BellSouth's performance falls short. The Commission finds that the remedy plan shall go into effect 45 days from issuance of order. This time will allow BST to put statistical methods and the remedy plan into operation.

3. Delta.

The "delta" is a measure of the meaningful difference between BellSouth performance and CLEC performance. In other words, certain levels of differing performance may have statistical significance, but in terms of impact on the end-user, be meaningless. See Varner, Tr. at 39. The delta takes into account this fact and ensures that a component of materiality is present in the statistical methodology. As explained by Mr. Varner, "the delta provides a way to determine whether a difference in performance measurements indicates that a difference in performance provided by BellSouth to itself and to a CLEC is material and should trigger the application of penalties." Varner, Tr. at 39. The FCC has recognized the need for a delta. In the *Bell Atlantic Order*, the FCC noted that random variation is inherent in the ILEC's process of providing interconnection and access to UNEs. Consequently, it is appropriate to determine whether or not such difference is material. Varner, Tr. at 39; Bell Atlantic Order, ¶ 59.

In its VSEEMs plan, BellSouth has proposed a delta of 1.0 to evaluate individual CLEC performance (Tier-1), and a delta value of 0.5 to evaluate CLEC aggregate results (Tier-2). Varner, Tr. at 40. The CLECs propose that this Commission adopt .25 as the parameter delta value. The CLECs state that this value is based on a judgment of an acceptable disparity in the number of CLEC customers and BellSouth customers receiving like quality service.

The Commission finds that the following delta values are appropriate and reasonable and shall be adopted for use in the plan: .50 for individual CLECs and .35 for CLEC Aggregate.

4. Absolute Cap.

The VSEEM Plan sets an automatic financial cap based on a percentage of BellSouth's net revenues in Georgia. Coon, Tr. at 115-16. The CLECs recommend a review threshold, or procedural cap, that only determines the point at which the LEC is permitted to seek relief from additional penalties from the state commission. The CLECs argue that, even after reaching the review threshold, BellSouth should be required to continue Tier 1 payments to CLECs because Tier 1 payments are intended in part to compensate CLECs for the harm incurred due to BellSouth's poor performance. In addition, while the review process is ongoing, BellSouth should continue to make Tier 2 payments into an interest-bearing registry or escrow account. To escape penalties beyond the threshold, BellSouth would have the burden of showing during the review hearing that its performance for CLECs in the aggregate did not merit the remedies invoked.

The Commission finds that this plan shall have an absolute cap of 44% of BellSouth's net revenues, which equals approximately \$340 million dollars.

5. Remedy Plan is subject to modification.

The Commission recognizes that the enforcement plan and the SQM are still largely untested and intends to closely monitor the effectiveness of the plan. Accordingly, the Commission reserves the right to modify the enforcement plan or SQMs at any time it deems necessary.

6. Tier II and III measures determined on a 3-month rolling basis.

Under BellSouth's proposal, Tier-2 enforcement mechanisms are triggered when BellSouth fails at the CLEC aggregate level on any one of the Tier-2 VSEEM measurements in a calendar quarter. Tier-3 enforcement mechanisms are triggered when BellSouth consistently fails at the CLEC aggregate level on any 5 of the BellSouth's 12 Tier-3 VSEEM measurements for 3 consecutive months in a calendar quarter.

The CLECs complain that VSEEM would permit a pattern of Tier 2 violations so long as they were timed so as not to occur within all three months of the same calendar quarter. Under BellSouth's proposal, for example, BellSouth could miss two months, be compliant for one month and avoid Tier 2 sanctions. Further, BellSouth could miss even four months in a row not in the same calendar quarter such as February, March, April and May and still not face Tier 2 sanctions.

To trigger Tier 3 consequences, BellSouth would need to violate the same five measures for an entire quarter. Coon Tr. 405. All five measures would need to be violated within the same quarter. Therefore, if BellSouth violated five measures in January, the same five measures in February and four of the same measures in March along with a different measure not violated in January and February, Tier 3 would not be invoked. *Id.* at 406. Further, BellSouth could violate the same five measures in February, March, April and May and Tier 3 would still not be invoked

because the violations did not continue through an entire calendar quarter

The Commission finds that Tier II and III measures should be determined on a 3-month rolling basis. For example, Tier-2 enforcement mechanisms shall be triggered when BellSouth fails at the CLEC aggregate level on any one of the Tier-2 VSEEM measurements for three consecutive months.

7. Tier III failures.

As discussed below, Tier III now contains 26 submetrics. When any 12 of the 26 experience failures for 3 consecutive months, Tier III is triggered. For a Tier III failure, BST may begin marketing long distance when all 12 of the 26 failed sub-metrics show favorable results for 3 consecutive months.

8. Approved Metrics.

The Commission approves the Metrics set forth below in each Tier of enforcement. The Performance Measures below represent the same SQMs, analogs/benchmarks approved in this Order.

ENFORCEMENT PLAN SUBMETRICS

TIER I AND TIER II SUBMETRICS

- Percent Response Received within "X" seconds
- Interface Availability (All Systems)(Exclude from Tier I Metric)
- Average Response Time for LMU Information (Non- Mechanized & Electronic)
- Percent Flow-Through Service Request (Electronic- Residence, Business, UNE and LNP)
- Reject Interval (Mechanized)
- FOC Timeliness (Mechanized, Partially Mechanized and Non-Mechanized)
- Acknowledgment Timeliness
- Acknowledgment Completeness
- FOC and Reject Completeness
- Order Completion Interval
 - Resale POTS
 - Resale Design
 - Loop + Port Combo
 - UNE Loops
 - UNE xDSL
 - UNE Line Sharing
 - Interconnection Trunks
- Percent Cooperative Testing for xDSL Loops

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- Percent Missed Installation Appointments
 - Resale POTS
 - Resale Design
 - Loop + Port Combo
 - UNE Loops
 - UNE xDSL
 - UNE Line Sharing
 - Interconnection Trunks
- Percent Provisioning Troubles within 30 days
(Same disaggregation as Order Completion Interval)
- Missed Repair Appointments
(Same disaggregation as Order Completion Interval)
- Customer Trouble Report Rate
(Same disaggregation as Order Completion Interval)
- Percent Troubles within 7 days of Hot Cut
- Coordinated Customer Conversion- Hot Cut Timeliness % within Interval and Average Interval
- Coordinated Customer Conversion
- Maintenance Average Duration
(Same disaggregation as Order Completion Interval)
- Percent Repeat Troubles Within 30 Days
(Same disaggregation as Order Completion Interval)
- LNP Disconnect Timeliness
- LNP Missed Installation Appointments
- Invoice Accuracy
- Mean Time to Deliver Invoices
- Usage Data Delivery Accuracy
- Trunk Group Performance
 - Aggregate
 - CLEC Specific
- Percent Missed Collocation Due Dates
- Timeliness of Change Management Notices and Documentation

TIER III SUBMETRICS

- Order Completion Interval
 - Resale POTS
 - Resale Design
 - Loop + Port Combo
 - UNE Loops
 - UNE xDSL

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- UNE Line Sharing
 - Interconnection Trunks
- Percent Missed Installation Appointments
 - Resale POTS
 - Resale Design
 - Loop + Port Combo
 - UNE Loops
 - UNE xDSL
 - UNE Line Sharing
 - Interconnection Trunks
- Percent Missed Repair Appointments
 - (Same disaggregation as Percent Missed Installation Appointments)
- Invoice Accuracy
- Mean Time to Deliver Invoices
- Trunk Group Performance-Aggregate
- Timeliness of Change Management Notice and Documentation
- Percent of Collocation Due Dates Missed

9. Late and incomplete reports.

In addition to Tier 1 and Tier 2 payments, the CLECs also propose that the Commission set consequences for certain problem activities related to the implementation of the performance measurements plan itself such as late performance reports. Since the performance plan is completely dependent on timely and reliable reporting, BST shall pay the following for late and incomplete reports:

Late performance reports - If performance reports are not available to a CLEC by the due day, BST should be liable for payments of \$2,000 to the CLEC for every day past the due date of the reports posting on the web.

Incomplete or revised reports - If performance reports are incomplete, or if previously reported data are revised, then BST should be liable for payments of \$400 to the effected CLEC for every day past the due date of the original reports posting on the web.

10. Market penetration adjustment.

BellSouth shall implement a market penetration adjustment for new and advanced services as follows:

- 1 In order to ensure parity and benchmark performance where CLECs order low volumes of advanced and nascent services, BST shall make additional payments to the Commission for deposit in the Georgia State Treasury when there are more than 10 and less than 100 observations for those measures

listed below on average statewide for a three-month period.

- Percent Missed Installation Appointments
 - UNE Loop+Port Combo
 - UNE xDSL
 - UNE Line Sharing
 - Average Completion Interval
 - UNE Loop+Port Combo
 - UNE xDSL
 - UNE Line Sharing
 - Missed Repair Appointments
 - UNE Loop+Port Combo
 - UNE xDSL
 - UNE Line Sharing
 - Maintenance Average Duration
 - UNE Loop+Port Combo
 - UNE xDSL
 - UNE Line Sharing
 - Average Response Time for Loop Make-Up Information
 - UNE Loop+Port Combo
 - UNE xDSL
 - UNE Line Sharing
- 2 The additional payments referenced in 1, above, shall be made if BST fails to provide parity for the above measurements as determined by the use of the Truncated Z-Test and the balancing critical value for 3 consecutive months.
- 3 If, for the three months that are utilized to calculate the rolling average, there were 100 observations or more on average for the sub-metric, then no additional voluntary payments under this market penetration adjustment provision will be made to Commission for deposit with the State Treasury. However, if during the same time frame there is an average of more than 10 but less than 100 observations for a sub metric on statewide basis, then BST shall calculate the additional payments to the Commission for deposit with the State Treasury by trebling the normal Tier II remedy and applying the method of calculating affected volumes ordered by the Commission.
- 4 Any payments made under this market penetration adjustment provision are subject to the Absolute Cap set by the Commission.

11. Corrective action plans.

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If any measure fails twice in any 3 consecutive months in a calendar year, BST must perform a "root cause analysis" and file with the Commission a corrective action plan within 30 days after the failure. The Commission will recommend to the Change Control Committee the priority to be given to the corrective action plan.

12. Staff Review.

Staff shall conduct a 6-month review of the SQMs as follows:

- 1 8 months after the date of a Commission order and every 6 months thereafter, the Commission Staff shall conduct a review of the measurements, benchmarks and analogs applicable to the performance of BellSouth. This review shall be for the purpose of modifying the SQMs and applicable analogs and benchmarks as deemed necessary by the Commission.
- 2 BellSouth, the CLEC Coalition, and any other interested parties shall file any proposed revisions to the SQMs, benchmarks and analogues 1 month prior to the beginning of each review period.
- 3 BellSouth, the CLEC Coalition, and any other interested party shall be allowed to submit comments on proposed changes and to submit any proposed additions.
- 4 The Commission Staff shall prepare a recommendation as to appropriate action to be taken by the Commission, if any, in connection with the review and shall submit this recommendation to the Commission for formal review and adoption.
- 5 The Commission Staff shall be authorized to modify this schedule at any time with written notice to interested parties.

13. Payments to the State.

All payments to the state under the enforcement plan shall be paid to the Commission for deposit in the State Treasury as penalties under O.C.G.A. § 46-2-91.

14. Force majeure.

The Commission recognizes that BellSouth's performance data may be influenced by factors beyond its control. Accordingly, in the event of a force majeure, BellSouth may file a petition for an exception with the Commission seeking to have the monthly service quality results modified. BellSouth will also be allowed to file an expedited petition seeking immediate relief from a payment pursuant to the enforcement plan in the event of a force majeure. In any such petition, BellSouth shall have the burden of demonstrating that the performance standard was not met due to causes beyond BellSouth's control and which could not have been avoided by

exercise of due care. The filing of any such petition shall not stay any payments under the enforcement plan unless otherwise ordered by the Commission.

III. CONCLUSION AND ORDERING PARAGRAPHS

The Commission finds and concludes that the performance measurements, the benchmarks and retail analogs, and the enforcement mechanisms set forth above are reasonable and appropriate and should be adopted pursuant to Georgia's Telecommunications and Competition Development Act of 1995 and Sections 251 and 252 of the Telecommunications Act of 1996.

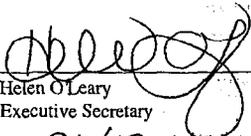
WHEREFORE IT IS ORDERED, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

ORDERED FURTHER, the performance measurements, the benchmarks and retail analogs, and the enforcement mechanisms set forth in the body of this Order are adopted and BellSouth shall submit such compliance filings as are necessary to reflect and implement the standards and mechanism established by this Order.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 3rd day of October, 2000.



Helen O'Leary
Executive Secretary
01/12/01

Date



Bob Durden
Chairman
01/12/01

Date

Bradbury, J M (Jay) - LGA

St
Tr

From: jwilliamson@att.com
Sent: Friday, June 30, 2000 12:53 PM
To: sr271lb@lga.att.com; bradbury@att.com
Subject: FW: Mechanization Project



-----Original Message-----
From: Mcallorum, K P (Kevin), NCAM
Sent: Monday, June 12, 2000 9:11 AM
To: Williamson, Jill R, NCAM
Subject: FW: Mechanization Project

-----Original Message-----
From: Beverly.Sheltonwilliams@bridge.bellsouth.com
{mailto:Beverly.Sheltonwilliams@bridge.bellsouth.com}
Sent: Friday, June 09, 2000 3:20 PM
To: Mcallorum, K P (Kevin), NCAM
Cc: Cheryl.Richardson@bridge.bellsouth.com
Subject: Mechanization Project

Kevin,

Please find attached a copy of the minutes from today's mechanization meeting.

If any changes or additions need to be made, please do so by cob on Tuesday, June 13.

Beverly

BellSouth AT&T Account Team/AT&T Mechanization Meeting
June 9, 2000

Attendees:

Kevin McAllorum- AT&T
Cheryl Richardson – BellSouth – AT&T Account Team
Beverly Shelton-Williams- BellSouth – AT&T Account Team

Today's meeting was designed to discuss the joint mechanization project between BellSouth's AT&T Account Team and AT&T. For the purpose of this project the sub-team will primarily focus on those components associated with the analysis, design, and validation phase.

Kevin will provide a copy of the updated project plan to the Account Team by close of business on Monday, June 12.

Beverly will provide a copy of the flow through matrix for Issue 9 to AT&T by close of business on Friday, June 16.

Bradbury, J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, June 30, 2000 12:53 PM
To: sr271lib@lga.att.com; bradbury@att.com
Subject: FW:

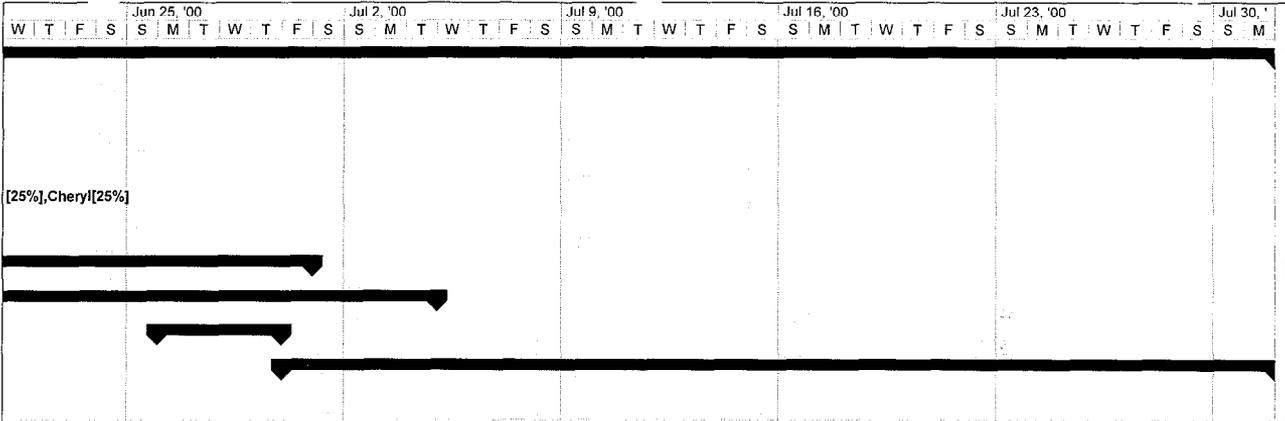


> -----Original Message-----
> From: Mcallorum, K P (Kevin), NCAM
> Sent: Monday, June 12, 2000 10:51 AM
> To: Williamson, Jill R, NCAM
> Subject:
>
> <<FlowThrough Project.mpp>>
> Updated project plan.
>
> Kevin P McAllorum
> OSS Manager
> AT&T Local Service and Access Management
> (404) 810-6923
> 1-800-258-0000 Pin # 2589095
> kmcallorum@att.com
>
>

ID	Task Name	Duration	Jun 4, '00							Jun 11, '00							Jun 18, '00						
			F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T		
1	Mechanization FlowThrough Project	42 days																					
2	Scope	4 days																					
3	Determine project scope	1 day																					
4	Secure project sponsorship	2 days																					
5	Define preliminary resources	1 day																					
6	Scope complete	0 days																					
7	Analysis	14 days																					
18	Design	23 days																					
27	Finalization/Validation	4 days																					
32	Deployment	22 days																					
45	Post Implementation Review	3 days																					

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 JMB-R20
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Project: Infrastructure Deployment Date: Wed 12/13/00	Task		Summary		*Rolled Up Milestone	
	Split		Project Summary		*Rolled Up Progress	
	Progress		*Rolled Up Task		External Tasks	
	Milestone		*Rolled Up Split		External Milestone	



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Project: Infrastructure Deployment
 Date: Wed 12/13/00

Task		Summary		*Rolled Up Milestone	
Split		Project Summary		*Rolled Up Progress	
Progress		*Rolled Up Task		External Tasks	
Milestone		*Rolled Up Split		External Milestone	

Bradbury, J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, June 30, 2000 12:57 PM
To: gperry@att.com; edwardgibbs@att.com; crafton@att.com; sr271lib@lga.att.com; bradbury@att.com; eppsteiner@att.com; bettybarrett@att.com; mrule@att.com; ktimmons@att.com; grady@att.com; katherinegrabill@att.com; mlacy@att.com; bseigler@att.com; vctate@att.com
Subject: FW: Flow Through Matrix
Importance: High



REQACQFT.PPT

All,

Attached is BellSouth's flow-through matrix for OSS'99 (Issue 9). We will use this document to begin facilitating the flow-through of additional order types with BellSouth. If you have any questions, please let us know.

Jill

-----Original Message-----

From: Beverly.Sheltonwilliams@bridge.bellsouth.com
[mailto:Beverly.Sheltonwilliams@bridge.bellsouth.com]
Sent: Friday, June 30, 2000 10:29 AM
To: Williamson, Jill R, NCAM; Mcallorum, K P (Kevin), NCAM
Subject: Flow Through Matrix
Importance: High

Jill and Kevin,

Please find attached a copy of the flow through matrix.

Beverly

Bradbury, J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Monday, August 02, 1999 12:42 PM
To: augier@att.com; bradbury@att.com; sr271lib@lga.att.com
Subject: FW: BST Mechanization Project



systems mechanization

As FYI

> -----
> **From:** Williamson, Jill R, NCAM
> **Sent:** Monday, August 02, 1999 9:58 AM
> **To:** Seigler, Bernadette M, NLSOP; Lacy, Michael L, LSOP LSBM; Tweedle,
> Timothy E (Tim), NLSOP; Hill, James S (Jim), NCAM
> **Subject:** BST Mechanization Project
>
> I'm working with BellSouth to improve on the mechanization and flow
> through of orders and have developed a matrix to categorize orders. The
> attached sheet is my first draft and I'd like your input prior to my
> sharing it with BellSouth.
>
> I've attempted to capture all of the types of orders we send or will send
> to BellSouth post OSS'99. I'd like to get as detailed as possible, so any
> corrections or additions you can make would be helpful. I'd appreciate
> your feedback as soon as possible.
>
> Jill
> <<systems mechanization>>
>

AT&T BELL SOUTH MECHANIZATION PROJECT

	Fully Electronic	CLEC Electronic; BST Partially Mechanized	CLEC Manual; Could be Sent Electronically	CLEC Manual; Cannot be Sent Electronically
Directory Listing Orders				
New Directory Listing	1			
Change Main Listing	2			
Add Additional Listing	1			
Delete Additional Listing	1			
Delete Listing Account	1			
Delete and Add Additional Listing	1			

LNP Orders				
Port a block of 20 DID numbers		1		
Port </= 50 TNs				
Port > 50 TNs				
Full Migration of a BST Account		1		
Partial Migration of a BST Account	1			

LNP w/Directory Listing Orders				
Port a block of 20 DID numbers w/simple DL		1		
Port </= 50 TNs w/simple DL				
Port > 50 TNs w/simple DL				
Full Migration of a BST Account w/simple DL	1			
Partial Migration of a BST Account w/simple DL		1		
Port a block of 20 DID numbers w/complex DL				1
Port </= 50 TNs w/complex DL				1
Port > 50 TNs w/complex DL				1
Full Migration of a BST Account w/complex DL				1
Partial Migration of a BST Account w/complex DL				1

INP Orders				
Port a block of 20 DID numbers				
Port </= 50 TNs				
Port > 50 TNs				
Full Migration of a BST Account				
Partial Migration of a BST Account				

Loop Orders				
<= 14 SL1 Loops				
> 14 SL1 Loops				
<= 14 SL2 Loops				
>14 SL2 Loops				
<= 14 DS0 Loops				
>14 DS0 Loops				
<= 14 DS1 Loops				
>14 DS1 Loops				
<= 14 ISDN BRI Loops				
>14 ISDN BRI Loops				

AT&T BELLSOUTH MECHANIZATION PROJECT

	Fully Electronic	CLEC Electronic; BST Partially Mechanized	CLEC Manual; Could be Sent Electronically	CLEC Manual; Cannot be Sent Electronically
Loop Orders with LNP				
<= 14 SL1 Loops w/LNP				
> 14 SL1 Loops w/LNP				
<= 14 SL2 Loops w/LNP				
>14 SL2 Loops w/LNP				
<= 14 DS0 Loops w/LNP				
>14 DS0 Loops w/LNP				
<= 14 DS1 Loops w/LNP				
>14 DS1 Loops w/LNP				
<= 14 ISDN BRI Loops w/LNP				
>14 ISDN BRI Loops w/LNP				

Loop Orders with LNP and Directory Listings				
<= 14 SL1 Loops w/LNP and simple DL				
> 14 SL1 Loops w/LNP and simple DL				
<= 14 SL2 Loops w/LNP and simple DL				
>14 SL2 Loops w/LNP and simple DL				
<= 14 DS0 Loops w/LNP and simple DL				
>14 DS0 Loops w/LNP and simple DL				
<= 14 DS1 Loops w/LNP and simple DL				
>14 DS1 Loops w/LNP and simple DL				
<= 14 ISDN BRI Loops w/LNP and simple DL				
>14 ISDN BRI Loops w/LNP and simple DL				
<= 14 SL1 Loops w/LNP and complex DL				
> 14 SL1 Loops w/LNP and complex DL				
<= 14 SL2 Loops w/LNP and complex DL				
>14 SL2 Loops w/LNP and complex DL				
<= 14 DS0 Loops w/LNP and complex DL				
>14 DS0 Loops w/LNP and complex DL				
<= 14 DS1 Loops w/LNP and complex DL				
>14 DS1 Loops w/LNP and complex DL				
<= 14 ISDN BRI Loops w/LNP and complex DL				
>14 ISDN BRI Loops w/LNP and complex DL				

Other				
RPN'd Orders		2+		
LNP Port from <=4 non-complex BST accounts to one AT&T account		1		
LNP Port from >4 non-complex BST accounts to one AT&T account		2+		
LNP Port from >1 complex BST account to one AT&T account		2+		
INP Port from many BST accounts to one AT&T account		2+		

BellSouth Flow-through Analysis for CLECs

Please define the following terms:

Complex Order: An order for a complex service.

Complex service: Any service which requires manual handling, such as negotiations with the customer, and manual service order generation.

Designed Service: Requires special engineering and provisioning, and may be served by more than one Central Office or Wire Center.

Non-Designed Service: Doesn't require special provisioning, and is served by one Central Office or Wire Center.

Hand-off package: The package of material and information which BellSouth account teams gather on a complex service which describes the customer's requirements and specifications of the service ordered.

Service Inquiry: The request from a customer (including CLECs) to inquire about ordering a complex service.

Project: An order for either a complex service or a large number of UNEs, for example, which requires coordination to ensure that related services are worked simultaneously or in the proper sequence to fulfill the order.

"Project Managed": The act of handling a project.

What specific activities does the LCSC perform for an error-free complex service ordered electronically which falls out for manual processing? *Response: The LCSC manually generates the service order into DOE or SONGS.*

Please provide a detailed flow-chart, including details of Account Team involvement in the process after the LSR has been electronically submitted. Please provide copies of any associated forms the LCSC must complete, and copies of LCSC instructions or methods and procedures. LCSC methods and procedures are intellectual property and cannot be viewed by CLECs.

In its January performance results, BellSouth reported that 5,720 (11% of total LENS LSRs) LSRs fell out of LENS for manual processing, and 3,022 (15% of total EDI LSRs) LSRs fell out of EDI for manual processing. Please provide a quantified breakdown of the reasons for fall out, i.e. the number of each type of service ordered which caused fallout, the number of various order or quantity types that caused fall-out, etc. Please provide this information by interface type. *See the matrix, which also requests this information.*

The following table addresses services and whether orders for those services will flow-through, and if not, why not. Are there other reasons other than types of services ordered that will cause

Louisiana Public Service Commission
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Exhibit B

an error-free order not to flow through, e.g. quantity, partial migrations, etc? If so, please provide all such reasons. *See the matrix*

Note: Please add any services provided as resale or UNEs to CLECs but omitted from the following matrix.

Response Please see attached flow-through explanation and flow chart

BellSouth Flow-through Analysis
For CLECS LSRs placed via EDI or TAG

	BellSouth Service Offered to CLEC via resale or UNE	Flow-through if no BST or CLEC Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service (Yes/No)	Can ordering this service cause fall out for a reason other than errors or complex? If so, what reason?
1	Flat Rate/Residence	Yes	No	No	no	
2	Flat Rate/Business	Yes	No	No	no	
3	Pay Phone Provider	No	No	No	no	
4	Measured Rate/Res.	Yes	No	No	no	
5	Measured Rate/Bus.	Yes	No	No	no	
6	Area Plus	Yes	No	No	no	
7	Package/Complete Choice and area plus	Yes	No	No	no	
8	Optional Calling Plan	Yes	No	No	no	
9	Ga. Community Calling	Yes	No	No	no	
10	Call Waiting Deluxe	Yes	No	No	no	
11	Call Waiting	Yes	No	No	no	
12	Caller ID	Yes	No	No	no	
13	Speed Calling	Yes	No	No	no	
14	3 Way Calling	Yes	No	No	no	
15	Call Forwarding-Variable	Yes	No	No	no	
16	Remote Access to CF	Yes	No	No	no	
17	Enhanced Caller ID	Yes	No	No	no	
18	Memory Call	Yes	No	No	no	
19	Memory Call Ans. Svc.	Yes	No	No	no	
20	MTS	Yes	No	No	no	
21	RCF	Yes	No	No	no	
22	Ringmaster	Yes	No	No	no	
23	Call Tracing	Yes	No	No	no	
24	Call Block	Yes	No	No	no	
25	Repeat Dialing	Yes	No	No	no	
26	Call Selector	Yes	No	No	no	
27	Call Return	Yes	No	No	no	
28	Preferred Call Forward	Yes	No	No	no	
29	Touchtone	Yes	No	No	no	
30	Visual Director	Yes	No	No	no	
31	INP (all types?)	Yes	UNE	No	no	
32	Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	No	Yes-designed, no-non-designed	
33	2 wire analog port	Yes	UNE	No	no	
34	Local Number Portability (always?)	Yes	UNE	No	no	
35	Accupulse	No	Yes	Yes	yes	See note at bottom of matrix.
36	Basic Rate ISDN	Yes	Yes	Yes	yes	
37	DID	No*	Yes	Yes	Yes	* yes with OSS'99 - 9/99
38	Frame Relay	No	Yes	Yes	yes	
39	Megalink	No	Yes	Yes	yes	
40	Megalink-T1	No	Yes	Yes	yes	

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Docket U-22252 Sub-Docket C
Exhibit B

	Bellsouth Service Offered to CLEC via resale or UNE	Flow-through if no BST or CLEC Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service (Yes/No)	Can ordering this service cause fall out for a reason other than errors or complex? If so, what reason?
41	Native Mode LAN Interconnection (NMLL)	No	Yes	Yes	yes	
42	Pathlink Primary Rate ISDN	No	Yes	Yes	yes	
43	Synchronet	Yes	Yes	Yes	yes	
44	PBX Trunks	Yes	Yes	Yes	Yes	
45	LightGate	No	Yes	Yes	yes	
46	Smartpath	No	Yes	Yes	yes	
47	Hunting	Yes	Yes	no	no	
48	CENTREX	No	Yes	Yes	no	
49	FLEXSERV	No	Yes	Yes	yes	
50	Multiserv	No	Yes	Yes	yes	
51	Off-Prem Stations	No	Yes	Yes	yes	
52	SmartRING	No	Yes	Yes	yes	
53	FX	No	Yes	Yes	yes	
54	Tie Lines	No	Yes	Yes	Yes	
55	WATS	No	Yes	Yes	yes	
56	4 wire analog voice grade loop	No	UNE	Yes	yes-designed, no-non-designed	
57	4 wire DS1 & PRI digital loop	No	UNE	Yes	yes	
58	2 wire ISDN digital loop	No	UNE	Yes	yes	
59	4 wire DS1 & PRI digital loop	No	UNE	Yes	yes	
60	ADSL	No*	UNE	Yes	yes	* yes as of OSS'99?
61	HDSL	No	UNE	Yes	yes	
62	2 wire analog DID trunk port	No	UNE	Yes	Yes	
63	2 wire ISDN digital line side port	No	UNE	Yes	yes	
64	4 wire ISDN DS1 digital trunk ports	No	UNE	Yes	yes	
65	UNE Combinations	y-loop+port	UNE	Yes	yes	
66	Directory Listings (simple)	No*	UNE	Yes	no	* yes as of OSS'99
67	Directory Listings (complex)	No*	UNE	yes	no	* yes as of OSS'99, captions and intentions
68	ESSX	No	Yes	Yes	no	

Note for last column: For all services that indicate "No" for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: expedites from CLECs, special pricing plans, for denials - restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS - e.g. gov't, or cannot be changed when changing main TN on C activity, low volume - e.g. activity type = move, pending order review required, more than 25 business lines, restore or suspend for UNE combos, transfer of calls option for CLEC end user - fixed with release 6.0, new TN not yet posted to BOCRIS. All but the last one are unique to the CLEC environment.

BellSouth Retail Flow-Through

Please define the following terms:

(See previous page – all the same definitions.)

Complex Order:

Complex service:

Designed Service:

Non-Designed Service:

Hand-off package:

Service Inquiry:

Project:

"Project Managed":

In its January performance results, BellSouth reported that 4.90% of its retail residence orders did not flow through, and that 21.24% of its retail business orders did not flow through. Please explain at what point in the process the orders failed to flow-through. Response: *The business retail flow-through is actually zero. This is due to the fact that all service orders entered into DOE or SONGS have to be manually generated by the service representatives. BellSouth has been incorrectly reporting its business retail flow-through, and will begin reporting it correctly as zero as of the March flow-through report. For residence, SOCS errors, other order errors, or orders that require manual handling such as inaccurate CSRs or low volume services cause fallout from flow-through.*

Please provide a quantified breakdown of the reasons for fall out, i.e. the number of each type of service ordered which caused fallout, the number of various order or quantity types that caused fall-out, etc. If BellSouth orders fall out for manual processing for different reasons than CLECs, please indicate. *Please see the matrix.*

What specific activities do the BellSouth retail order centers perform in order to successfully submit into SOCS an error-free BellSouth order that initially failed to flow-through? Please provide copies of any associated forms the retail centers must complete, and copies of instructions or methods and procedures. *Retail business office methods and procedures are intellectual property and therefore cannot be viewed by CLECs.*

The following table addresses services and whether orders for those services will flow-through, and if not, why not. Are there other reasons other than types of services ordered that will cause an error-free order not to flow through, e.g. quantity, partial migrations, etc.? If so, please provide all such reasons.

1	Flat Rate/Residence	Yes	No	No	No	No	No	Yes
2	Flat Rate/Business	No	No	No	No	No	No	Yes
3	Pay Phone Provider	No	No	No	No	No	No	Yes
4	Measured Rate/Res.	Yes	No	No	No	No	No	Yes
5	Measured Rate/Bus.	No	No	No	No	No	No	Yes
6	Area Plan	Yes	No	No	No	No	No	Yes
7	Package/Complete Choice	Yes	No	No	No	No	No	Yes
8	Optional Calling Plan and area plan	Yes	No	No	No	No	No	Yes
9	Ca. Community Calling	Yes	No	No	No	No	No	Yes
10	Call Waiting Decline	Yes	No	No	No	No	No	Yes
11	Call Waiting	Yes	No	No	No	No	No	Yes
12	Caller ID	Yes	No	No	No	No	No	Yes
13	Speed Calling	Yes	No	No	No	No	No	Yes
14	3 Way Calling	Yes	No	No	No	No	No	Yes
15	Call Forwarding-Variable	Yes	No	No	No	No	No	Yes
16	Remote Access to CF	Yes	No	No	No	No	No	Yes
17	Enhanced Caller ID	Yes	No	No	No	No	No	Yes
18	Memory Call	Yes	No	No	No	No	No	Yes
19	Memory Call Adv. Svc.	Yes	No	No	No	No	No	Yes
20	MTS	Yes	No	No	No	No	No	Yes
21	RCF	Yes	No	No	No	No	No	Yes
22	Call Tracing	Yes	No	No	No	No	No	Yes
22	Ringmaster	Yes	No	No	No	No	No	Yes
	Offered to Retail Customers	Flowthrough if no BST from (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service (Yes/No)	Can ordering this service cause "fall out" for a reason other than error or conflict? If so, what reason?	Order input into NS/DO/SONGS	Y=No N=Yes NS/DO/SONGS placed in order if manual handling occurs prior to input into NS/DO/SONGS or after input into NS/DO/SONGS
	Flat Rate/Residence	Yes	No	No	No	All business orders are manually service order generated.	Yes	Yes
	Flat Rate/Business	No	No	No	No		Yes	DO/SONGS
	Pay Phone Provider	No	No	No	No		Yes	DO/SONGS
	Measured Rate/Res.	Yes	No	No	No		Yes	DO/SONGS
	Measured Rate/Bus.	No	No	No	No		Yes	DO/SONGS
	Area Plan	Yes	No	No	No		Yes	DO/SONGS
	Package/Complete Choice	Yes	No	No	No		Yes	DO/SONGS
	Optional Calling Plan and area plan	Yes	No	No	No		Yes	DO/SONGS
	Ca. Community Calling	Yes	No	No	No		Yes	DO/SONGS
	Call Waiting Decline	Yes	No	No	No		Yes	DO/SONGS
	Call Waiting	Yes	No	No	No		Yes	DO/SONGS
	Caller ID	Yes	No	No	No		Yes	DO/SONGS
	Speed Calling	Yes	No	No	No		Yes	DO/SONGS
	3 Way Calling	Yes	No	No	No		Yes	DO/SONGS
	Call Forwarding-Variable	Yes	No	No	No		Yes	DO/SONGS
	Remote Access to CF	Yes	No	No	No		Yes	DO/SONGS
	Enhanced Caller ID	Yes	No	No	No		Yes	DO/SONGS
	Memory Call	Yes	No	No	No		Yes	DO/SONGS
	Memory Call Adv. Svc.	Yes	No	No	No		Yes	DO/SONGS
	MTS	Yes	No	No	No		Yes	DO/SONGS
	RCF	Yes	No	No	No		Yes	DO/SONGS
	Call Tracing	Yes	No	No	No		Yes	DO/SONGS
	Ringmaster	Yes	No	No	No		Yes	DO/SONGS

Backscat Flow-Through

	Background Services Offered to Retail Customers	Readthrough (Low BIF Error) (Yes/No)	Complex Service (Yes/No)	Complex Other (Yes/No)	Design Service (Yes/No)	Can offering this service cause "tag out" for a reason other than errors or complexity? If so, what reason?	Order input into RNS/DOE/SO/SONCS? Yes/No	If order requires manual handling, please indicate if manual handling occurs prior to input into RNS/DOE/SO/SONCS or after input into RNS/DOE/SO/SONCS
24	Call Block	Yes	No	No	NO		Yes	
25	Repeat Dialing	Yes	No	No	NO		Yes	
26	Call Selector	Yes	No	No	NO		Yes	
27	Call Return	Yes	No	No	NO		Yes	
28	Preferred Call Forward	Yes	No	No	NO		Yes	
29	Trunktone	Yes	No	No	NO		Yes	
30	Visual Director	Yes?	No	No	NO		Yes	
31	Local Number Portability (delayed)	NO?	No	No	NO		Yes	
32	Acceptance	No	Yes	Yes	Yes	All business orders are manually service order entered.	Yes	Man. doing DPE/SONCS
33	Basic Rate ESDN	No	Yes	Yes	Yes		Yes	
34	D/D	No	Yes	Yes	Yes		Yes	
35	Frame Relay	No	Yes	Yes	Yes		Yes	
36	Megalink	No	Yes	Yes	Yes		Yes	
37	Megalink II	No	Yes	Yes	Yes		Yes	
38	Native Mode LAN Interconnection (MPLD)	No	Yes	Yes	Yes		Yes	
39	Partial Primary Rate ESDN	No	Yes	Yes	Yes		Yes	
40	Specialist	No	Yes	Yes	Yes		Yes	
41	PRV Trunk	No	Yes	Yes	Yes	* usually not; no if loop start trunk.	Yes	
42	LINKS	No	Yes	Yes	Yes		Yes	
43	Smart Call	No	Yes	Yes	Yes		Yes	
44	Smart Call	No	Yes	Yes	Yes		Yes	
45	Smart Call	No	Yes	Yes	Yes		Yes	
46	CALL VEG	No	Yes	Yes	Yes	* for RNS only *No for Imp; business	Yes	
47	TELESENY	No	Yes	Yes	Yes		Yes	
48	WebTV	No	Yes	Yes	Yes		Yes	

46	Off-peak Sublines	No	Yes	Yes	Yes		Yes	
	Business Services Offered to Retail Customers	Fortnightly if on BST Excess (Yes/No)	Complete Service (Yes/No)	Complete Order (Yes/No)	Design Service Yes/No	Can ordering this service cause "fill-out" for a reason other than error or completed if no, what reason?	Order Input into RNSDDE/SOMNS7 Yes/No	If order requires manual handling, please indicate if manual handling occurs prior to input into RNSDDE/SOMNS7 or other input into RNSDDE/SOMNS7
49	SEARCHING	No	Yes	Yes	Yes	All business orders are normally service order processed.	Yes	Man. during DOESOMNS
50	EX Te Lease	No	Yes	Yes	Yes		Yes	
51	Te Lease	No	Yes	Yes	Yes		Yes	
52	WATS	No	Yes	Yes	Yes		Yes	
53	Directory Listing (General)	Yes	Yes	Yes	no		Yes	
54	Directory Listing (Company)	No	Yes	Yes	no		Yes	
55	ESSX	No	Yes	Yes	no		YES/ONS	

Note: Please add any services provided by BST at retail but omitted from the following matrix.

ADSL	no	yes	yes	yes	yes	All business orders are manually service order generated.	yes	
Broadband ATM serv.	No	yes	yes	yes	yes		yes	
Adv. Telecomm. Svc.	No	yes	yes	yes	yes		yes	
Connecticut Data	no	yes	yes	yes	yes		yes	
Managed Netw. Svc.	No	yes	yes	yes	yes		yes	
LAN monitoring								
Electr. Commerce								
Chirblak	no	yes	yes	yes	yes		yes	
Video conferencing	no	yes	yes	yes	yes		yes	
Fax messaging	no	yes	yes	yes	yes		yes	
Zipconnect	no	yes	yes	yes	yes		yes	
Back-up Line	no	yes/no	yes/no	yes/no	yes/no	Depending on if the service backed up is a complete or degraded service	yes	

Note: for BST residence orders, other causes of failure include manual handling for CSR transactions and low volume service.

1 PLACE: Dobbs Building, Raleigh, North Carolina

2 DATE: August 2, 2000

3 TIME IN SESSION: 9:00 a.m. - 1:05 p.m.

4 BEFORE: Chair Jo Anne Sanford, Presiding
Commissioner Ralph A. Hunt
5 Commissioner Judy Hunt
Commissioner William R. Pittman
6 Commissioner J. Richard Conder
Commissioner Robert V. Owens, Jr.
7 Commissioner Sam J. Ervin, IV

8

9 IN THE MATTER OF:
Docket Number P-140, Sub 73
and Docket Number P-646, Sub 7.

10

11 AT&T Communications and TCG of the Carolina's
Arbitration with BellSouth Telecommunications.

12

VOLUME 4

13

A P P E A R A N C E S:

14

FOR AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.:

15

Jim Lamoureux, Senior Attorney
Suzanne Ockleberry
1200 Peachtree Street
16 Atlanta, Georgia 30309

17

Marsha E. Rule, Senior Attorney
101 North Monroe Street
18 Tallahassee, Florida 32301

19

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Docket No. 2000-465
JMB-R22
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1 APPEARANCES CONTINUED

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- 1 didn't make assumptions, you actually had the actual
2 data, it's a different result. He doesn't have full
3 knowledge of this information.
- 4 Q. And the significance of that different result is
5 what?
- 6 A. Is I see no significance in Mr. Bradbury's
7 analysis.
- 8 Q. I guess I don't understand why you took the time
9 to debunk it then.
- 10 A. Because Mr. Bradbury took the time to put it in
11 his deposition or -- excuse me, not his deposition, his
12 testimony, and I had to respond to it.
- 13 Q. I'd like to direct your attention to, I guess, a
14 customer service assistant sitting in front of the ROS
15 interface.
- 16 A. Okay. Excuse me one second. I'm going to try to
17 get myself a little organized up here. Let me
18 straighten up the desk here.
- 19 Q. Sure, take all the time you need. I'll do the
20 same.
- 21 A. Thank you. I'm ready.
- 22 Q. Can you -- while the customer service assistant is
23 sitting in front of ROS, can you tell me any service
24 that that BellSouth representative can't type in

- 1 information and get an order out the other end, any
2 service or element that they can't use ROS to enter
3 information for?
- 4 A. I am not aware of any service element that they
5 cannot type in in a sales service order SOCS acceptable
6 format.
- 7 Q. Okay. And they can do that even for complex
8 orders, correct?
- 9 A. Yes, just like DOE is utilized in the LCSC.
- 10 Q. That's assuming that all the appropriate manual
11 work has been done, right?
- 12 A. Yes.
- 13 Q. And perhaps beating a dead horse here, if I'm the
14 customer service rep, I'm sitting in front of ROS, I've
15 entered in the information and the order comes out in
16 SOCS, I have available to me other databases that have
17 been populated by the one act of entering information,
18 don't I?
- 19 A. Yes, you do, just like the CLECs do. They have
20 access to the same databases.
- 21 Q. But they don't have it in their own databases like
22 BellSouth does, do they?
- 23 A. No, they're responsible for their databases.
- 24 Q. So they would have to make an additional entry

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of: :

AT&T'S Petition for Arbitration of :
Rates, Terms and Conditions with : Docket No. 11853-U
BellSouth Telecommunications :

Hearing Room 507
47 Trinity Avenue
Atlanta, Georgia

Tuesday, October 31, 2000

The above-entitled matter came on for hearing
pursuant to adjournment at 2:03 p.m.

BEFORE:

ROBERT DURDEN, Chairman
DAVID BURGESS, Vice Chairman
LAUREN "BUBBA" MCDONALD, Commissioner
ROBERT BAKER, Commissioner

* * *

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JMB-R23
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I N D E X

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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By Mr. Lackey	--	676	--	--
Alphonso J. Varner				
By Mr. Ross	727	--	--	--
Keith Milner				
By Mr. Lackey	809	--	947	--
By Mr. Lamoureaux	--	899	--	--
Ronald M. Pate				
By Mr. Lackey	951	--	--	--
By Ms. Rule	--	1089	--	--

<u>EXHIBITS:</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
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CHAIRMAN DURDEN: This hearing of the Georgia Public Service Commission in Docket Number 11853-U will now come to order.

Cross examination of Mr. Talbott is proceeding.

VICE CHAIRMAN BURGESS: No, he's got to presented.

COMMISSIONER BAKER: He has to be sworn.

CHAIRMAN DURDEN: Oh, he's just now coming up?

MR. ROSS: Yes, sir.

CHAIRMAN DURDEN: Well, go ahead and call him then.

MR. ROSS: Just one housekeeping matter, Mr. Chairman. I believe BellSouth forgot to introduce into evidence BellSouth Exhibits 4 and 5 and we'd ask that that be done at this time.

CHAIRMAN DURDEN: Any objection?

(No response.)

CHAIRMAN DURDEN: Admitted without objection.

(The documents, heretofore marked as BellSouth Exhibits 4 and 5, were received in evidence.)

MR. LAMOUREUX: AT&T calls as its next witness Dave Talbott.
Whereupon,

DAVID TALBOTT

1 gateway interface. What AT&T really wants is entirely new
2 non-industry standard machine-to-machine maintenance and
3 repair interface. This simply isn't required. Through
4 TAFI, BellSouth provides AT&T access to the same system used
5 by BellSouth's own retail units. AT&T's representatives who
6 use TAFI see the same screens, can perform the same
7 functions and have absolutely nondiscriminatory access to
8 BellSouth's maintenance and repair system.

9 What AT&T complains about is that it can't be
10 integrated into AT&T's back office systems. That may well
11 be true, but as the FCC has said in Texas and New York, that
12 is not necessary as long as AT&T has the same access to
13 BellSouth's maintenance and repair system as does BellSouth
14 retail units. And it does.

15 If AT&T actually wants a machine-to-machine
16 interface for maintenance and repair, it can ask for one, as
17 long as it is willing to pay for the development of such a
18 system, it can have one. Instead, AT&T is simply asking
19 this Commission to provide AT&T with more than it is
20 entitled to, and to provide the service at no cost to AT&T.

21 If it can get away with that kind of approach, I suppose it
22 makes good business sense. But in this case, parity doesn't
23 require such a systems. If AT&T wants it, it should pay for
24 it.

25 Thank you, this concludes my summary.

CROSS EXAMINATION

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BY MS. RULE:

Q Good afternoon, Mr. Pate.

A Good afternoon.

Q I'm Marsha Rule and we've met before, haven't we, Mr. Pate?

A Yes.

Q I recognize that the hour is late, so I will endeavor not to keep y'all very long. I've got a couple of questions for you about change control, Mr. Pate --

A Certainly.

Q -- Issue 41. This Commission has actually been a leader in the region on the issue of change control, hasn't it?

A Yes, they have.

Q And, in fact, the original change management process was established by BellSouth in connection with this Commission's guidance, wasn't it?

A The Commission was very active back several years -- well not years, but months -- roll over years -- yes.

Q So you would agree, wouldn't you, that the Commission certainly has the expertise and the historic knowledge to review the current change control process to determine if it should be modified as AT&T requests?

A Well now, I don't know that I agree with that.

1 I'm not saying -- not the expertise in the Commission, by
2 any means. While they've given some guidance from their
3 understanding of what the need is, I think the expertise
4 lies with BellSouth and the CLECs.

5 Q Have you reviewed Mr. Bradbury's rebuttal Exhibit
6 Number 3 that shows all the changes to the change control
7 process that AT&T is requesting?

8 A Yes, I have.

9 Q And do you understand that AT&T isn't asking
10 BellSouth to adopt this exhibit, or asking the Commission to
11 adopt the exhibit and write it in stone, but to adopt it as
12 part of the ongoing change control process?

13 A I'm not quite sure that I understood it that way.
14 The way I heard Mr. Bradbury state it was he wanted the
15 Commission to order us to do these. To me, that's pretty
16 much adopted in stone. I haven't heard, or did not pick out
17 in his testimony where he was referring that this would just
18 be a starting point.

19 Q Now you've described the change control process as
20 collaborative, haven't you?

21 A Yes, I have.

22 Q And changes to BellSouth's business rules are
23 supposed to go through the collaborative change control
24 process, aren't they?

25 A That's as currently defined, yes.

1 Q Okay. Now BellSouth recently released some
2 business rule changes that didn't go through the process, is
3 that correct?

4 A Which ones are you referring to?

5 Q Issue 9-G of BellSouth's business rule changes.

6 A I think there were some that did not get the
7 proper coverage, I would agree.

8 Q And some of those business rule changes required
9 CLECs to do some coding on the CLEC side of the interface in
10 order to continue passing orders, is that correct?

11 A I have not personally reviewed it but, subject to
12 check, I'll accept that.

13 Q And are you aware that the CLECs have explained to
14 BellSouth that they didn't have enough notice or time to do
15 the coding that would be required?

16 A That's what I've heard, yes, that specific one
17 that you're referring to.

18 Q And BellSouth released Issue 9-G of the changes in
19 any event, didn't it?

20 A That's what happens -- to my understanding, that's
21 correct. However, let me just clarify that this has been an
22 evolving process, evolving from not just a standpoint of the
23 documentation, but also evolving from BellSouth in
24 developing its internal processes to support the process.
25 So while what you say has happened in that case, there may

1 be other instances where we didn't follow it as well as it
2 is currently documented today. It hasn't always been
3 clearly documented that way. And our internal processes
4 have been refined, and we are committed to the -- to the
5 process.

6 Q What's the current version number of the change
7 control process?

8 A 2.0.

9 Q When was that adopted as 2.0?

10 A August -- I think it -- I've forgot the exact
11 date. August 23rd or something along that time frame.

12 Q And when was Issue 9-G of the business rule
13 changes released?

14 A I'm not sure.

15 Q It was well after August, wasn't it?

16 A I'm not sure.

17 Q Now, if I understand your testimony, one of the
18 reasons that you object to this Commission making a
19 determination about AT&T's request for changes to the change
20 control process is that only AT&T and BellSouth are involved
21 in the docket, correct?

22 A Only in this docket as an arbitration, that's
23 correct.

24 Q Okay. So you believe it would be more appropriate
25 for this Commission to make these issues part of its ongoing

1 OSS docket?

2 A No, I really don't. What I think would be more
3 appropriate is for the Commission to send the guidance back
4 to the body itself, a forum -- industry forum to work
5 through these issues. And if they cannot actually resolve -
6 - once you fine tune to those few issues that we just can't
7 see eye to eye, there's a process built in there for
8 internal escalation within BellSouth, and if that's not
9 sufficient, then to take it in the form of an issue to the
10 appropriate commission.

11 VICE CHAIRMAN BURGESS: Let me ask a question.
12 One of the concerns -- I just have a general concern about
13 making changes to the process documented in the arbitration
14 cases. I read this document during the day, and one of the
15 things that I noticed in the section regarding changes of
16 processes, it doesn't include anything about arbitration
17 being a vehicle to make changes or not make changes. So I
18 guess in my mind, one of the concerns I would have is, if
19 another party filed arbitration -- say the Commission
20 adopted this agreement, there's nothing in this agreement
21 that I see that would prohibit another party from seeking to
22 arbitrate the same issue, saying we've got some problems
23 with the process, the change management process, and coming
24 back here and making those changes in the context of an
25 arbitration case. I guess one of the questions is, if the

1 Commission were to adopt these changes, should there be some
2 verbiage in this document that would provide one method to
3 change of process is arbitration? I ask you that question,
4 Mr. Pate, just hypothetically, if the Commission were to
5 adopt this document, would it be necessary to include as a
6 vehicle for prospective change future arbitrations?

7 THE WITNESS: Well that's absolutely the question,
8 Commissioner. To me, from my personal view, arbitration is
9 still not the appropriate forum, because arbitration really
10 exists between BellSouth and one particular individual CLEC.

11 And as much as CLECs work jointly in some areas, I don't
12 think any of them are going to give proxy to another CLEC in
13 arbitration to state their issues around something that
14 impacts them all. However, nothing prevents them from
15 joining in terms of trying to ask the Commission to give a
16 general docket or a complaint, things of that nature, if
17 they agree to whatever they're filing. And to me, that's
18 what we're trying to say in the process, that you can take
19 it to the Commission through a formal proceeding, not an
20 arbitration proceeding. It could be a complaint filed or
21 whatever if they have an issue in dispute we cannot resolve
22 among ourselves.

23 BY MS. RULE:

24 Q Mr. Pate, do you agree that this Commission does
25 have authority to order changes in the change control

1 process?

2 A This Commission has the authority to order
3 anything that it thinks is appropriate. That's for this
4 Commission to decide.

5 Q Turning to Issue 42. Do you understand that AT&T
6 is asking in this case for the ability to submit electronic
7 orders for all services and elements?

8 A Yes.

9 Q And you would agree, wouldn't you, that electronic
10 ordering is cheaper and faster, generally speaking, than
11 manual ordering?

12 A Generally speaking. There's only a couple
13 exceptions. One would be where you just don't have the
14 volume for that particular transaction. If you did one or
15 two of something a year, it's not going to be cheaper to go
16 through the process of the dollars associated with
17 developing that code and maintaining that code. In that
18 case, because there's so few, you probably really are
19 cheaper to have someone manually do it.

20 Q Okay. So generally you agree with me with that
21 exception?

22 A Yes.

23 Q And generally speaking again, electronic ordering
24 and processing is less prone to error, isn't it?

25 A Yes and no. I mean, you're still prone to the

1 errors of entry, but then all the mechanization takes place
2 after that and obviously it's less prone.

3 Q BellSouth has already gone ahead and automated
4 some ordering and processing for CLECs, hasn't it?

5 A Yes, most definitely.

6 Q For example, CLECs can order residential POTS
7 resale electronically and it will be processed
8 electronically, correct?

9 A Yes. I mean, to state it clearly, 82 percent,
10 based on last month's order volume, was submitted
11 electronically -- BellSouth. Eighty-two percent of all the
12 electronic -- excuse me, all the LSR submissions.

13 Q And most of those were for resale, weren't they?

14 A Certainly. I mean, that's your highest volume, in
15 resale, certainly.

16 Q Now, if I understand your testimony correctly --
17 in your written testimony, you say that electronic
18 processing of most other services -- for which electronic
19 ordering and processing isn't available for CLECs right now.
20 You're saying it's also not available to BellSouth, is that
21 correct?

22 A I'm not quite following you. I apologize. Do you
23 have a particular place to refer me or just restate the
24 question for me.

25 Q Sure. Let's take a look at page 110 of your

1 testimony, beginning on line 3.

2 A 110, line 3?

3 Q There's a sentence that begins on line 3. It
4 starts out because.

5 A Yes, I've read that.

6 Q Could you read that, please?

7 A Do you want me to read the sentence? I'm sorry.

8 Q Yes.

9 A Okay. The sentence that starts on line 3 of 110
10 of my testimony reads, "Because the same manual processes
11 are in place for both CLEC and BellSouth retail orders, the
12 processes are competitively neutral, which is exactly what
13 both the Act and FCC require".

14 Q Okay. Now you also explain in your testimony that
15 MultiServe is an example of a service that you say BellSouth
16 has not automated for itself, correct?

17 A Yes.

18 Q And while you've got your testimony, could you
19 turn to your Exhibits 15 and 16, please.

20 Commissioners, I have copies of those exhibits for
21 you, so you don't have to flip through your documents.

22 CHAIRMAN DURDEN: Okay, fine.

23 BY MS. RULE:

24 Q Now Exhibit 15, which is not -- unfortunately is
25 not indicated on this document, is labeled CLP, Complex

1 Services, Multiserve, correct?

2 A Yes.

3 Q And that means CLP, and that's a North Carolina
4 designation for competitive local provider, correct?

5 A That's correct.

6 Q And the next document, which is your exhibit 16,
7 is labeled BST Retail: Complex Services, MultiServe,
8 correct?

9 A That's correct.

10 Q And in these two documents, you say that you
11 compare the multiserve ordering process for BellSouth retail
12 and for the CLECs, correct?

13 A Yes.

14 Q And we talked about these same documents in North
15 Carolina, didn't we?

16 A Yes, we did.

17 Q Let's take a look at the diagram for BellSouth
18 retail first. There's a notation at the bottom of the page
19 that says shade indicates manual processing.

20 A Yes.

21 Q So all these boxes that are shaded means that
22 there are manual steps involved and they are not electronic
23 for BellSouth, correct?

24 A That's correct.

25 Q Over on the right-hand side of the page there are

1 two boxes that are unshaded. Could you tell me what the top
2 of that two boxes represent?

3 A Are you referring to the box that reads CSA-order
4 entry into ROS?

5 Q Yes, sir.

6 A ROS is the regional ordering system. That's the
7 BellSouth system where we submit our service orders for our
8 business transactions. The CSA is the customer service
9 assistant that actually enters the order. Then you can see
10 the line is indicating it's going to the service order
11 communication systems, SOCS. That's where that order, once
12 entered in the SOCS-compatible format, is transmitted there
13 for further provisioning by the down-stream systems.

14 Q And those aren't shaded, so that means that's an
15 electronic process on this schedule, correct?

16 A That means it's an electronic transmission of a
17 SOCS-compatible formatted service order to SOCS.

18 Q Okay. Could you turn to Exhibit 15, the CLEC
19 complex service order.

20 A I'm there.

21 Q Okay. And the two unshaded boxes are more in the
22 middle of the page here. What do those indicate?

23 A The one in the middle, the first one, reads CSA -
24 order entry into DOE. So there's still a customer service
25 assistant entering into the direct order entry, which is the

1 system we used in the local carrier service center for
2 entering the orders that are submitted to us that we get
3 manually. You can see the line indicating to the same
4 system, which is the common point, the service order
5 communications system, SOCS, for once again, further
6 downstream provisioning processing.

7 Q Okay. But in each case, it's a BellSouth customer
8 service representative who is doing the ordering into the
9 system, is that correct?

10 A That is correct. It's designed that way.

11 Q Okay. Now when the customer service
12 representative enters the order into ROS on the BellSouth
13 chart, it has an electronic record of the order, correct?

14 A I'm not quite clear what you mean by electronic
15 record.

16 Q Well, I guess one way to put it would be that --
17 or to ask you whether the order entry into ROS by the
18 BellSouth customer service representative creates any
19 information in any other BellSouth back-end system.

20 A What it creates is a service order that's
21 transmitted to the SOCS for further provisioning.

22 Q Well, let's say -- does it also update the
23 customer service information records?

24 A That order itself that's created in ROS does not.
25 That's part of the provisioning process.

1 Q Does the customer service representative have to
2 enter it separately into the customer service information
3 records, or is that record created as part of the same
4 order/entry process?

5 A The information that you're updating into the
6 customer service record is a result of the provisioning
7 process. It is a result of when that order is submitted and
8 when it's provisioned by the various further downstream
9 systems when the order is actually completed. That gets it
10 updated into the customer records information.

11 Q Well if you'll give me a moment, Mr. Pate, I'm
12 going to look in to North Carolina transcript, because I
13 believe you agreed with me that there was an order/entry --
14 one-time order/entry that updated some other data bases.
15 So, I guess the question I would ask you is, have you
16 changed your answer?

17 A No, I haven't changed any answer from North
18 Carolina, so I'm obviously not hearing the question the
19 same.

20 Q I'll let Mr. Bradbury look that up.

21 Okay, let's look at the CLP, complex services
22 chart, again. Again, this is a BellSouth customer service
23 representative entering information into DOE, correct?

24 A That's correct.

25 Q Does that electronic entry create any billing

1 record entries for the CLEC?

2 A It only creates the billing record when we bill
3 the CLEC. The CLECs, if you're referring to how they bill
4 they bill their customers, no that would be a part of their
5 systems.

6 Q And the CLEC's customer service information
7 records aren't updated either by the act of that order-
8 entry, are they?

9 A Definitely not. That's not how it's designed nor
10 a requirement that I'm aware of.

11 Q Okay. On the other hand, BellSouth gets to order
12 -- or enter the order information once into the ROS system
13 and that information is then accessible in other parts of
14 BellSouth's back-end systems, isn't it?

15 A That information is actually placed in whatever
16 appropriate systems is a result of that provisioning of
17 BellSouth, if that's what you mean by it's available, yes.

18 Q Okay. As a result of that one order entry
19 process?

20 A As a result of a representative from BellSouth
21 entering a service order, like it's always been, then the
22 system is going to process that and update whatever
23 appropriate systems are for us to serve that customer.
24 That's our system's design, what we refer to as the Legacy
25 systems.

1 Q So as a result of BellSouth's system design and
2 the way BellSouth has chosen to set up the systems for
3 CLECs, if the CLEC wants to have the same information in its
4 back-end systems, it'll have to go through a separate order-
5 entry or information-entry process, won't it?

6 A Only for that that's manually submitted is it
7 going to have to do so. You know, a big issue with the FCC
8 is being able to give you orders that are integratable, and
9 that you can get some information back and integrate your
10 system. But you're responsible for that part of your system
11 that's going to do that integration.

12 Q Well, I would rather not get into the FCC orders.
13 Do you understand that what AT&T is asking for is basically
14 to be able to have its customer service representative type
15 the information into a system that will allow electronic
16 ordering, just as BellSouth has, and allow its internal or
17 back-end systems to be populated just as BellSouth does?

18 A No, actually I don't understand it that way.
19 Based on what your request was, was the ability to submit
20 all of your orders electronically. I've never read anything
21 into this at all about you being able to get any information
22 back to update your systems. It's being able to get it --
23 input it and get it to flow through is the two issues --
24 sub-issues that you've discussed there. So I have not
25 interpreted it that way.

1 COMMISSIONER BAKER: Mr. Pate, what are the
2 drawbacks, technically or financially, to complying with the
3 request AT&T has made? I mean, as for cost, just give me
4 your best educated guess.

5 THE WITNESS: Certainly. Well they have two
6 issues. Now the first issue is to be able to submit
7 everything electronically, and their concern, as I
8 understand it is, that we actually had the opportunity to do
9 such since our systems are designed that way under SOC-
10 compatible format. For a CLEC to do that, though, we're
11 dealing with a local service request format, an industry
12 standard national format. That we have to take that and
13 actually convert it. You have to develop coding to convert
14 that LSR format to a SOCs format so our systems can process
15 it. That is rather challenging for the very complex orders
16 to do so. We haven't been able to develop that code, how to
17 do that, make that translation in all of these cases.
18 That's the issue from just the ability to submit it
19 electronically.

20 One way they could do it, if they had our exact
21 same system, which there are many reasons probably why they
22 would not want to. One, it's not an industry standard. It
23 would only work for BellSouth's region. I haven't found
24 anybody frankly that's made the offer that's willing to go
25 through that investment as a CLEC, to train their personnel

1 to use a system just for that purpose. Plus, some of these
2 systems won't do -- like a -- may not do all the
3 transactions that they would have a need for in terms --
4 they would have to have -- my sinuses are kicking in here --
5 to try to explain this. They may have to have more than one
6 system to be able to do residential versus business the way
7 it's designed. For example, if they used our R&S system,
8 that's only designed to do residential.

9 And to get to the other issue is the flowing
10 through of everything. I've really kind of touched on it
11 already in that translations piece. That's the main
12 component associated with that and we haven't been able to
13 develop that coding. We have -- I'm not saying that you
14 can't do it for everything, but the ones where we're down to
15 now are extremely complex orders. We haven't figured out
16 how to do it and some of those are of a volume nature that I
17 discussed earlier. You may not want to do it. You don't
18 enough of them.

19 COMMISSIONER BAKER: But just to give me an idea,
20 it sounds like this is an expensive, complicated process, is
21 that right?

22 THE WITNESS: Oh, most definitely. I mean, it's
23 going to be very expensive just to figure out the coding,
24 much less put it all in place and then maintain it on and
25 on-going basis as things may change here. I mean, these are

1 things that you're talking about developing without any type
2 of industry standards to assist in that process. Those may
3 still evolve. Not that we wait on industry standards,
4 sometimes we try to be the leader of those. This is not an
5 easy effort. I know this Commission has looked at through
6 the performance docket, to try to put a team out there to
7 assess, to improve these things. And if that's what this
8 Commission orders in that, you know, we're going to be
9 obviously leading that effort trying to do that. But we're
10 already trying to do that now and it's a challenge.

11 COMMISSIONER BAKER: Well would -- just
12 hypothetically, what if a CLEC, or a group of CLECs said we
13 will make the financial commitment to go hire, I don't know,
14 a computer consultant, a software consultant to make this
15 work? I mean, if Bell -- if they were willing to do that,
16 spend their own money to develop the system, BellSouth
17 checked it out, it works, it's not going to crash your
18 system, something like that might be acceptable?

19 THE WITNESS: I would be definitely willing to
20 entertain that. No one has come forth, obviously, with that
21 type of offer, but we definitely would be receptive to
22 sitting down and viewing what they would like to do in that
23 respect.

24 COMMISSIONER BAKER: Well what about if you just
25 said well, we estimate the cost will be X and we'll divide

1 it out among all the CLECs and this is your proportionate
2 share, would you do it?

3 THE WITNESS: Well, I think actually that kind of
4 happens in OSS recovery, but I'm not the cost expert when
5 you think of it from that standpoint.

6 BY MS. RULE:

7 Q A follow-up question, Mr. Pate. For every
8 business service that BellSouth offers its retail customers,
9 a customer service representative will sit down and enter an
10 order into ROS, correct?

11 A Yes, that's correct.

12 Q And then that order is electronically sent to SOCS
13 where a service order is produced, correct?

14 A Well, yes, but let me make sure I clarify that
15 point. I mean, these things don't happen by osmosis.
16 You've got to enter this stuff somewhere. My technical term
17 stuff, this service order -- the systems that we've designed
18 is to enter it in that SOCS-compatible format. The issue
19 we're talking about here is taking an LSR format and making
20 that translations, which could end up in several SOCS
21 orders. That's complex. That's not easy to do. It's that
22 translation, the coding and the impact of that that's at
23 issue.

24 Q And that's exactly what AT&T wants, isn't it?

25 A Yes. I can understand why you would want it. I'm

1 just telling you that that's not something simple to do. We
2 haven't been able to figure out how to do it, even though if
3 you look at our results from the amount of orders that was
4 submitted a year ago, this same time frame electronically
5 was 49 percent. As I've already said, today it is 82
6 percent. I think we've made some pretty darned good
7 progress in a year's time.

8 Q And that 80-some percent referred to resale
9 orders, did it not?

10 A No, no, it refers to all orders --

11 Q The bulk of which --

12 A -- of which the bulk are resale. If you take a
13 look at the numbers and look particularly at the unbundled
14 network elements, it has grown significantly this year as a
15 result of our efforts.

16 Q Okay. Turning your attention to maintenance and
17 repair. TAFI can't be used for maintenance and repair of
18 all types of services, can it?

19 A No, it's for basically POTS services.

20 Q Okay. So that leaves out unbundled loops and
21 switching and transport among other things?

22 A Yes.

23 Q Okay. And EFTA doesn't allow CLEC customers to --
24 or customer service representatives to correct all the
25 service problems that they could correct if they were using

1 TAFI, does it?

2 A I don't quite follow your question. Try me again.
3 I apologize.

4 MS. RULE: Well there might be an easier way to do
5 this. In order to avoid asking you any questions about the
6 FCC's order, what I would like to do, Commissioners, is mark
7 as an exhibit an excerpt of the FCC's Louisiana 2 order, ask
8 you to take official notice of the order and just let the
9 order speak for itself and then I'm done.

10 CHAIRMAN DURDEN: That is a marvelous idea.

11 (Laughter.)

12 CHAIRMAN DURDEN: We will take administrative
13 notice of it and allow you to introduce it.

14 MS. RULE: And I believe that would be Exhibit
15 Number 66.

16 CHAIRMAN DURDEN: Is there any objection to that?
17 I can't imagine that there would be.

18 MR. LACKEY: No, sir.

19 CHAIRMAN DURDEN: And I'm correct. So it's
20 admitted without objection.

21 (The document referred to was
22 marked for identification as AT&T
23 Exhibit Number 66 and received in
24 evidence.)

25 MS. RULE: I'm content to let the FCC's order on

1 TAFI and EFTA speak for itself and I have no more questions.

2 CHAIRMAN DURDEN: Okay. And, of course, I'll
3 remind you that if you want to make any commentary about it
4 or any argument based on it, just put it in the brief.

5 BY MS. RULE:

6 Q Mr. Lackey has a request which I'm happy to
7 fulfil, and that is about your North Carolina testimony.
8 Unfortunately, I have only one copy of it.

9 MR. LACKEY: Show it to him.

10 BY MS. RULE:

11 Q On page 205 of the North Carolina transcript, let
12 me direct your attention to -- beginning on page -- or line
13 18 through the next page.

14 (The witness reviews the document.)

15 A Okay, I've read it.

16 Q And do you recall now agreeing with me that once
17 the CSA enters the order into ROS, BellSouth has an
18 electronic record of the order?

19 A Yeah, it seems to be the same way you asked the
20 question. My brain is not working as good I can tell you.
21 But from the standpoint that it's electronically created and
22 transmitted from a transmission to SOCS, and then SOCS does
23 further provisioning, I think that's the framework that
24 we're talking about in North Carolina, and I still agree
25 with that.

1 Q And you answered yes, correct?

2 A Yes.

3 Q And you agreed that the electronic record could
4 then populate various databases such as billing records?

5 A As part of the overall provisioning process, all
6 of that gets populated. It's electronically done. It's a
7 mechanized process unless something falls out as part of the
8 provisioning process, then someone may have manual
9 intervention. They correct, do whatever it is. Then much
10 of it is done electronically going forward.

11 Q And you agree that it can populate customer
12 service information records and maintenance and repair
13 databases?

14 A Oh, yes, certainly. Yeah, that's part of the
15 process.

16 MS. RULE: Thank you.

17 MR. LACKEY: No redirect. I would like to move
18 Exhibits 23 through 39.

19 CHAIRMAN DURDEN: Any objection?

20 (No response.)

21 CHAIRMAN DURDEN: They're admitted without
22 objection.

23 (The documents heretofore marked as
24 BellSouth Exhibits 23 through 39,
25 were received in evidence.)

1 MS. RULE: And AT&T would move 66.

2 CHAIRMAN DURDEN: The witness is excused.

3 (Witness excused.)

4 CHAIRMAN DURDEN: Any objection?

5 (No response.)

6 CHAIRMAN DURDEN: It's admitted without objection.

7 (The document heretofore marked as
8 AT&T Exhibit Number 66 was received
9 in evidence.)

10 Do we have any other housekeeping matters?

11 (No response.)

12 CHAIRMAN DURDEN: I believe the procedural and
13 scheduling order sets forth -- does it not set forth a
14 briefing schedule?

15 MS. OCKLEBERRY: The problem, Mr. Chairman, would
16 be, we moved direct testimony out several times, so I don't
17 think it actually comports with the time period because
18 we've moved the hearing. That was changed also.

19 CHAIRMAN DURDEN: Okay. Well we need to set a --
20 will five days be long enough?

21 MS. OCKLEBERRY: No, Commissioner.

22 MR. LACKEY: Mr. Ross is writing the brief. If
23 you would like it tomorrow it's okay with me.

24 (Laughter.)

25 CHAIRMAN DURDEN: Well, how long will it take you

1 to get a brief done?

2 MS. OCKLEBERRY: We don't even have the transcript
3 yet.

4 CHAIRMAN DURDEN: Well they'll get you the
5 transcript PDQ.

6 MS. OCKLEBERRY: If we could have 10 days?

7 CHAIRMAN DURDEN: I'll give you 10 days, 10
8 calendar days from today.

9 MS. OCKLEBERRY: Can we negotiate 10 business
10 days?

11 CHAIRMAN DURDEN: Let the record reflect that Mr.
12 Lackey is showing facial expressions indicating great
13 consternation. I thought you said your brief was ready to
14 be filed?

15 MR. LACKEY: No, I said Mr. Ross had to write it
16 and it could be tomorrow.

17 CHAIRMAN DURDEN: Okay. He doesn't need a
18 transcript to do his. I'm sorry, I'm --

19 MR. LACKEY: We're tired.

20 CHAIRMAN DURDEN: Yeah, we're all tired. Let the
21 record reflect that I'm -- these pitiful attempts at levity
22 are mine.

23 How long, two weeks? Do we have a deadline that
24 we're going to run up against? I don't want to run up
25 against a deadline.

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STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF THE
INTERCONNECTION AGREEMENT
NEGOTIATIONS BETWEEN AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC., TCG
OF THE CAROLINAS, INC., and
BELLSOUTH TELECOMMUNICATIONS,
INC., Pursuant to 47 U.S.C.
Section 252

Docket No. P-140, Sub 73
Docket No. P-646, Sub 7

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DEPOSITION OF  
DOUGLAS W. McDOUGAL

July 28, 2000

11:00 a.m.

1200 Peachtree Street, N.E.  
Atlanta, Georgia

Wanda L. Robinson, CRR, CCR No. B-1973

Docket No. 2000-465  
JMB-R24  
Page 1 of 3

1 I would be something that's actually  
2 impacting operational performance, causing us  
3 to not be able to process an order as  
4 quickly as we should, as accurately as we  
5 should.

6 Anything that impedes them doing  
7 their job is essentially a Severity 1.

8 Q. Do you know if there is a time  
9 frame, a target time frame for solving  
10 Severity 1 problems?

11 A. Generally I think the target time  
12 frame is 24 hours.

13 Q. At the end of that 24 hours, if  
14 it all works as planned, what should happen?

15 A. The software would be updated in  
16 the next maintenance period, which hopefully  
17 would be after midnight the next day. They  
18 wouldn't upgrade software during production  
19 environment.

20 Q. Would you repeat the last part?

21 A. They would not upgrade software  
22 during the day, during production. They  
23 would upgrade software at night, put it  
24 through a test process on test platforms and  
25 ensure they didn't create another anomaly

1 If you can answer, you can. If you can't,  
2 don't.

3 Q. (By Ms. Rule) Do you know who  
4 the head of the IT organization is?

5 A. From the perspective of local  
6 systems or the head of BellSouth Corporate  
7 IT?

8 Q. Local systems.

9 A. You're looking for an officer  
10 level name or non-officer level name?

11 Q. Not necessarily officer level.  
12 Somebody who could define for me what the  
13 various severity levels are.

14 THE WITNESS: Can we give a name?

15 MR. EDENFIELD: If you know  
16 someone who can give the severity levels.

17 A. My key interface into the IT  
18 organization is Susan Baughman,  
19 B-A-U-G-H-M-A-N.

20 Q. I imagine from your job  
21 description, you're very familiar with the  
22 operation of the LCSC?

23 A. Fairly familiar.

24 Q. You've described some processes  
25 where an LCSC service rep will lease an

1 within the software before putting it on the  
2 production boxes.

3 Q. You mentioned the next maintenance  
4 period. How often do maintenance periods  
5 occur?

6 A. Every night.

7 Q. What happens during maintenance?

8 A. Tables are updated, bug fixes are  
9 tested and implemented.

10 Q. That's Severity 1. What are the  
11 other severity levels?

12 A. I can't give you the definitions,  
13 but there obviously are less severe  
14 situations than SEV 2, SEV 3. I can't  
15 define them for you.

16 Q. Do you know who could?

17 A. Sure. Our IT organization can  
18 define those.

19 Q. Possible name? Do you have a  
20 name for me?

21 A. I can't tell you the best name on  
22 the systems, I'll be honest. I've only been  
23 on the job for a week. I can give you  
24 some names but I'm not sure I would --

25 MR. EDENFIELD: Let's not guess.

1 order to a downstream system. One of the  
2 things we're very interested in, obviously,  
3 is flowthrough. Do you have a flowthrough  
4 definition that's used to describe service  
5 orders that come into the LCSC and go out of  
6 them, what constitutes flowthrough for you?

7 A. A couple of different definitions  
8 of flowthrough. I'm not sure there's a  
9 definition. But generally flowthrough  
10 describes an order that flows through our  
11 systems through the Service Order Control  
12 System, or SOCS, without being touched by a  
13 service rep. In other words, it came in  
14 electronically generally and flows through  
15 those systems.

16 However, we also have flowthrough  
17 on orders that come in by fax and paper  
18 because we get tremendous numbers of fax and  
19 paper orders, particularly from smaller CLECs.  
20 So we attribute flowthrough to once the  
21 service rep builds the order and releases the  
22 order to the downstream systems, it flows  
23 without erroring out. So there are different  
24 definitions.

25 Q. So basically, though, it sounds

1 like the difference in the definition is  
 2 where you start it off?  
 3 A. That's right.  
 4 Q. So if we're starting off an  
 5 electronic order, the point at which you  
 6 begin to judge whether it flows through is  
 7 before it even comes to the LCSC, correct?  
 8 MS. RULE: Strike that.  
 9 Q. The point at which you begin to  
 10 determine flowthrough is when it leaves the  
 11 CLEC hands, correct?  
 12 A. No. I wouldn't agree with that.  
 13 Q. If You could correct me.  
 14 A. I would say that when it hits our  
 15 mainframe. If it doesn't fatally reject,  
 16 because fields are missing, then it could  
 17 flowthrough. But the order can come in from  
 18 your EDI system into our EDI receiver, and  
 19 it could be rejected due to fields being  
 20 missing. Obviously it wouldn't flow through.  
 21 We would never see that. That would be a  
 22 system-to-system interface. We wouldn't  
 23 attribute it leaving your system; we would  
 24 attribute it beginning at the receiver of our  
 25 systems.

1 assist us. So one of those three systems  
 2 would be built. Those are service order  
 3 generators. That's the purpose of those  
 4 systems.  
 5 Q. So when would you say the order  
 6 has been built?  
 7 A. At completion of that activity.  
 8 Q. What happens after the order has  
 9 been built on the service order generator?  
 10 A. It's handed off to the Service  
 11 Order Control System, SOCS. More edits are  
 12 applied to it, and SOCS is a conduit to  
 13 multiple other downstream systems, particularly  
 14 network provisioning systems, in order to get  
 15 the order actually provisioned in the  
 16 network, and it's a front end to our billing  
 17 systems. Front end to provisioning systems,  
 18 various provisioning systems, and front end  
 19 to billing systems. Those are the next  
 20 steps.  
 21 Q. So if I understand you correctly,  
 22 paper comes in, LCSC service rep builds order  
 23 on the service order generator, whichever one  
 24 is applicable to that particular order,  
 25 releases the order to SOCS, more edits are

1 Q. You mentioned that for  
 2 flowthrough, for orders received via fax or  
 3 on paper, that the service rep builds the  
 4 order and releases it to downstream systems,  
 5 correct?  
 6 A. That's right.  
 7 Q. Can you define for me what you  
 8 mean by the service rep building an order?  
 9 A. A local service request comes in,  
 10 an LSR, local service request. That order  
 11 can be faxed in or be delivered by overnight  
 12 mail. The service rep's responsibility is to  
 13 turn that into a true service order that  
 14 meets the BellSouth definitions of service  
 15 order. Field sizes, number of fields, what  
 16 has to be populated, what's option, et  
 17 cetera. They would use a service order  
 18 generated program to build that order.  
 19 If it's an LNP order, they would  
 20 use the LNP gateway. If it's not an LNP  
 21 orders, they would use one of two systems:  
 22 DOE, Direct Order Entry System, or SONGS. I  
 23 don't know what that stands for. Service  
 24 Order Negotiation System, I think.  
 25 They would use one of those to

1 applied. If it passes those edits, it's  
 2 then released to downstream provisioning  
 3 systems?  
 4 A. Correct.  
 5 Q. When does the order become  
 6 assignable? When does it achieve assignable  
 7 status?  
 8 A. I'm not sure what you mean by  
 9 assignable.  
 10 Q. Are you familiar with BellSouth's  
 11 processes for building orders for its own  
 12 customers, it's own retail customers?  
 13 A. No.  
 14 From SOCS down, it's the same  
 15 process, but I'm not really familiar to talk  
 16 to you about routine process, if those are  
 17 the same systems.  
 18 Q. When the order leaves the service  
 19 order generator, does anything happen to it  
 20 between the time it leaves the service order  
 21 generator and the time it leaves SOCS except  
 22 those edits you described to me?  
 23 A. Hopefully not. The objective is  
 24 that it's perfect.  
 25 Q. Can you tell me how flowthrough

**BellSouth**  
**Service Quality Measurements Performance Reports**

**ORDERING**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Report/Measurement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                  |
| <b>O-3. Flow-Through Error Analysis</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                  |
| <b>Definition:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                  |
| An analysis of each error type (by error code) that was experienced by the LSRs that did not flow through and reach a status for a FOC to be issued.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                  |
| <b>Exclusions:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                  |
| Each Error Analysis is error code specific; therefore exclusions are not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                  |
| <b>Business Rules:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                  |
| The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued. The CLEC mechanized ordering process does not include LSRs, which are, submitted manually (e.g., fax, and courier).                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                  |
| <b>Calculation:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                  |
| E Of errors by type                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                  |
| <b>Report Structure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                  |
| <ul style="list-style-type: none"> <li>• Provides an analysis of each error type (by error code). The report is in descending order by count of each error code and provides the following: <ul style="list-style-type: none"> <li>➢ Error Type (by error code)</li> <li>➢ Count of each error type</li> <li>➢ Percent of each error type</li> <li>➢ Cumulative percent</li> <li>➢ Error Description</li> <li>➢ CLEC Caused Count of each error code</li> <li>➢ Percent of aggregate by CLEC caused count</li> <li>➢ Percent of CLEC by CLEC caused count</li> <li>➢ BST Caused Count of each error code</li> <li>➢ Percent of aggregate by BST caused count</li> <li>➢ Percent of BST by BST caused count</li> </ul> </li> </ul> |                                                                                                                                                                                                  |
| <b>Level of Disaggregation:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                  |
| <b>Region</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                  |
| <b>Data Retained Relating to CLEC Experience</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Data Retained Relating to BST Experience</b>                                                                                                                                                  |
| <ul style="list-style-type: none"> <li>• Report month</li> <li>• Total number of LSRs received</li> <li>• Total number of errors by type ( by error code) <ul style="list-style-type: none"> <li>➢ CLEC caused error</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• Report month</li> <li>• Total number of errors by type (by error code) <ul style="list-style-type: none"> <li>➢ BST system error</li> </ul> </li> </ul> |
| <b>Retail Analog/Benchmark:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                  |
| Not Applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                  |

Revision Date: 02/22/00 (tm)

**BellSouth**  
**Service Quality Measurements Performance Reports**

**LSR Flow-Through Matrix**

| PRODUCT                             | F/T             | COMPLEX SERVICE | COMPLEX ORDER | PLANNED FALLOUT FOR MANUAL HANDLING <sup>1</sup> | EDI | TAG <sup>2</sup> | LENS 99 <sup>4</sup> | LENS <sup>3</sup> | COMMENTS |
|-------------------------------------|-----------------|-----------------|---------------|--------------------------------------------------|-----|------------------|----------------------|-------------------|----------|
| 2 wire analog DID trunk port        | No <sup>5</sup> | UNE             | Yes           | Yes                                              | N   | N                | N                    | N                 |          |
| 2 wire analog port                  | Yes             | UNE             | No            | No                                               | Y   | Y                | N                    | N                 |          |
| 2 wire ISDN digital line side port  | No              | UNE             | Yes           | Yes                                              | N   | N                | N                    | N                 |          |
| 2 wire ISDN digital loop            | No              | UNE             | Yes           | NA                                               | Y   | Y                | N                    | N                 |          |
| 3 Way Calling                       | Yes             | No              | No            | NA                                               | Y   | Y                | Y                    | Y                 |          |
| 4 wire analog voice grade loop      | Yes             | UNE             | Yes           | NA                                               | Y   | Y                | N                    | N                 |          |
| 4 wire DS0 & PRI digital loop       | No              | UNE             | Yes           | Yes                                              | N   | N                | N                    | N                 |          |
| 4 wire DS1 & PRI digital loop       | No              | UNE             | Yes           | Yes                                              | N   | N                | N                    | N                 |          |
| 4 wire ISDN DSI digital trunk ports | No              | UNE             | Yes           | Yes                                              | N   | N                | N                    | N                 |          |
| Accupulse                           | No              | Yes             | Yes           | NA                                               | N   | N                | N                    | N                 |          |
| ADSL                                | No              | UNE             | Yes           | Yes                                              | N   | N                | N                    | N                 |          |
| Area Plus                           | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Basic Rate ISDN                     | No              | Yes             | Yes           | Yes                                              | Y   | Y                | N                    | N                 |          |
| Call Block                          | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Call Forwarding-Variable            | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Call Return                         | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Call Selector                       | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Call Tracing                        | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Call Waiting                        | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Call Waiting Deluxe                 | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| Caller ID                           | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |
| CENTREX                             | No              | Yes             | Yes           | NA                                               | N   | N                | N                    | N                 |          |
| DID WITH PBX ACT W                  | No              | Yes             | Yes           | Yes                                              | Y   | N                | Y                    | N                 |          |
| DID ACT W                           | No              | Yes             | Yes           | Yes                                              | Y   | N                | Y                    | N                 |          |
| Digital Data Transport              | No              | UNE             | Yes           | NA                                               | N   | N                | N                    | N                 |          |
| Directory Listing Indentions        | No              | No              | No            | Yes                                              | Y   | Y                | Y                    | Y                 |          |
| Directory Listings Captions         | No              | No              | Yes           | Yes                                              | Y   | Y                | Y                    | N                 |          |
| Directory Listings (simple)         | Yes             | No              | No            | No                                               | Y   | Y                | Y                    | Y                 |          |

Service Quality Measurements Performance Reports

|                                        |     |       |     |     |   |   |   |   |                        |
|----------------------------------------|-----|-------|-----|-----|---|---|---|---|------------------------|
| DS3                                    | No  | UNE   | Yes | NA  | N | N | N | N |                        |
| DS1 Loop                               | Yes | UNE   | Yes | Yes | Y | Y | N | N |                        |
| DSO Loop                               | Yes | UNE   | Yes | Yes | Y | Y | N | N |                        |
| Enhanced Caller ID                     | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| ESSX                                   | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Flat Rate/Business                     | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| Flat Rate/Residence                    | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| FLEXSERV                               | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Frame Relay                            | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| FX                                     | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Ga. Community Calling                  | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| HDSL                                   | No  | UNE   | Yes | NA  | N | N | N | N |                        |
| Hunting MLH                            | No  | C/S ° | C/S | Yes | Y | Y | N | N |                        |
| Hunting Series Completion DM10         | No  | C/S   | C/S | Yes | Y | Y | Y | Y |                        |
| Hunting Series Completion              | No  | C/S   | C/S | Yes | Y | Y | Y | Y |                        |
| INP RECTYPE B                          | Yes | UNE   | No  | No  | Y | Y | N | N |                        |
| INP RECTYPE C                          | Yes | UNE   | No  | No  | Y | Y | N | N |                        |
| LightGate                              | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Local Number Portability               | Yes | UNE   | Yes | No  | Y | Y | N | N | Yes - LENS, April 2000 |
| LNP with Complex Listing               | No  | UNE   | Yes | Yes | Y | Y | N | N |                        |
| LNP with Partial Migration             | No  | UNE   | Yes | Yes | Y | Y | N | N |                        |
| LNP with Complex Services              | No  | UNE   | Yes | Yes | Y | Y | N | N |                        |
| INP to LNP Conversions                 | No  | UNE   | Yes | Yes | Y | Y | N | N |                        |
| Measured Rate/Bus.                     | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| Measured Rate/Res.                     | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| Megalink                               | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Megalink-T1                            | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Memory Call                            | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| Memory Call Ans. Svc.                  | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| Multiserv                              | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Native Mode LAN Interconnection (NMLI) | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Off-Prem Stations                      | No  | Yes   | Yes | NA  | N | N | N | N |                        |
| Optional Calling Plan                  | Yes | No    | No  | No  | Y | Y | Y | Y |                        |
| Package/Complete Choice and area plus  | Yes | No    | No  | No  | Y | Y | Y | Y |                        |

Service Quality Measurements Performance Reports

|                                                                                                                                                                                        |     |     |     |     |   |   |   |   |                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|-----|---|---|---|---|------------------------|
| Pathlink Primary Rate ISDN                                                                                                                                                             | No  | Yes | Yes | NA  | N | N | N | N |                        |
| Pay Phone Provider                                                                                                                                                                     | No  | No  | No  | NA  | N | N | N | N |                        |
| PBX Standalone ACT A,C, D                                                                                                                                                              | No  | Yes | Yes | Yes | Y | Y | Y | N |                        |
| PBX Trunks                                                                                                                                                                             | No  | Yes | Yes | Yes | Y | Y | Y | N |                        |
| Port/Loop Combo                                                                                                                                                                        | Yes | UNE | No  | N   | Y | Y | N | N | Yes - LENS, April 2000 |
| Port/Loop PBX                                                                                                                                                                          | No  | No  | No  | Yes | Y | Y | N | N |                        |
| Preferred Call Forward                                                                                                                                                                 | Yes | No  | No  | No  | Y | Y | Y | Y |                        |
| RCF Basic                                                                                                                                                                              | Yes | No  | No  | NA  | N | N | N | N |                        |
| Remote Access to CF                                                                                                                                                                    | Yes | No  | No  | No  | Y | Y | Y | Y |                        |
| Repeat Dialing                                                                                                                                                                         | Yes | No  | No  | No  | Y | Y | Y | Y |                        |
| Ringmaster                                                                                                                                                                             | Yes | No  | No  | No  | Y | Y | Y | N |                        |
| Smartpath                                                                                                                                                                              | No  | Yes | Yes | NA  | N | N | N | N |                        |
| SmartRING                                                                                                                                                                              | No  | Yes | Yes | NA  | N | N | N | N |                        |
| Speed Calling                                                                                                                                                                          | Yes | No  | No  | No  | Y | Y | Y | Y |                        |
| Synchronet                                                                                                                                                                             | No  | Yes | Yes | NA  | Y | Y | N | N |                        |
| Tie Lines                                                                                                                                                                              | No  | Yes | Yes | NA  | N | N | N | N |                        |
| Touchtone                                                                                                                                                                              | Yes | No  | No  | No  | Y | Y | Y | Y |                        |
| Unbundled Loop-Analog 2W, SL1, SL2                                                                                                                                                     | Yes | UNE | No  | No  | Y | Y | N | N | Yes - LENS, April 2000 |
| WATS                                                                                                                                                                                   | No  | Yes | Yes | NA  | N | N | N | N |                        |
| XDSL Extended LOOP                                                                                                                                                                     | No  | UNE | Yes | NA  | N | N | N | N |                        |
|                                                                                                                                                                                        |     |     |     |     |   |   |   |   |                        |
|                                                                                                                                                                                        |     |     |     |     |   |   |   |   |                        |
|                                                                                                                                                                                        |     |     |     |     |   |   |   |   |                        |
| <p>Note 1: Planned Fallout for Manual Handling denotes those services that are electronically submitted and are not intended to flow through due to the complexity of the service.</p> |     |     |     |     |   |   |   |   |                        |
| <p>Note 2: The TAG column includes those LSR submitted via RoboTAG.</p>                                                                                                                |     |     |     |     |   |   |   |   |                        |
| <p>Note 3: The LENS column denotes the ordering status of services prior to OSS 99.</p>                                                                                                |     |     |     |     |   |   |   |   |                        |
| <p>Note 4: The LENS 99 column denotes the ordering status of services post OSS 99.</p>                                                                                                 |     |     |     |     |   |   |   |   |                        |

**BellSouth**

**Service Quality Measurements Performance Reports**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |  |  |  |  |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|--|--|--|
| <b>Note <sup>5</sup>:</b> For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: Expedites from CLECs, special pricing plans, for denials – restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS – e.g. gov't, or cannot be changed when changing main TN on C activity, low volume – e.g. activity type T=move, pending order review required, more than 25 business lines, restore or suspend for UNE combos, transfer of calls option for CLEC end user— new TN not yet posted to BOCRIS. All but the last one are unique to the CLEC environment. |  |  |  |  |  |  |  |  |  |
| <b>Note <sup>6</sup>:</b> Services with C/S in the Complex Service and/or the Complex Order columns can be either complex or simple                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  |  |  |  |  |  |  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |  |  |  |  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |  |  |  |  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |  |  |  |  |  |

1 STATE OF NORTH CAROLINA  
2 UTILITIES COMMISSION  
3 RALEIGH

4 BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

5 IN THE MATTER OF THE  
6 INTERCONNECTION AGREEMENT  
7 NEGOTIATIONS BETWEEN AT&T  
8 COMMUNICATIONS OF THE  
9 SOUTHERN STATES, INC., TCG  
10 OF THE CAROLINAS, INC., and  
11 BELLSOUTH TELECOMMUNICATIONS,  
12 INC., Pursuant to 47 U.S.C.  
13 Section 252

Docket No. P-140, Sub 73  
Docket No. P-646, Sub 7

14 DEPOSITION OF  
15 RONALD PATE

16 July 20, 2000

17 9:06 a.m.

18 1200 Peachtree Street, N.E.  
19 Atlanta, Georgia

20 Arne' B. Davis, CCR-B-1475  
21  
22  
23  
24  
25

Docket No. 2000-465  
JMB-R26  
Page 1 of 3

1 designate by various interfaces whether it  
 2 can be submitted using that electronic  
 3 interface.  
 4 Q. So, as a CLP, I should be able  
 5 to look at this table and determine which  
 6 types of the services and products that I  
 7 want to order for my customers, can only be  
 8 ordered manually. Correct?  
 9 A. As well as electronically, yes.  
 10 Q. So if I look in the fifth column  
 11 headed, Planned Fallout for Manual Handling,  
 12 and I compare that information with the  
 13 various EDI, TAG, LENS '99 and LENS columns,  
 14 I can tell whether I can order a product  
 15 electronically, but it will encounter design  
 16 manual fallout?  
 17 A. Yes.  
 18 Q. This document also shows me what  
 19 products and services that I might order that  
 20 would encounter manual fallout for reasons  
 21 other than by design?  
 22 A. I guess I'm trying to understand  
 23 the question. Manual fallout is supposed to  
 24 be only by design. So I'm confused by the  
 25 question.

1 out. Does trigger a couple throughout where  
 2 ones designed to flow through could actually  
 3 fall out as in footnote 5. For example, let  
 4 me find here for clarification purposes --  
 5 well, you go by the first one, expedite from  
 6 a CLEC, so an order that they have expedited  
 7 request -- that's been designed for flow  
 8 through by the nature they expedited it --  
 9 it's going to have to fall out. So we can  
 10 manually process it in order to try to meet  
 11 their request. So you understand exactly from  
 12 what I was saying earlier, there are  
 13 situations such as foot note 5.  
 14 Q. Seems to me, looking at footnote  
 15 5, and that flow through column, that  
 16 footnote 5 is actually complying to all the  
 17 yeses in that column, inside of that first  
 18 no. Do you agree? I'm wondering if it's a  
 19 typo.  
 20 A. I see from your approach, the  
 21 person who authored this, I see from the way  
 22 you're looking at it now, the confusion it  
 23 could create. To see if there might be a  
 24 better way -- more likely, it would be up  
 25 there, besides the FT itself.

1 Q. Does fallout for manual handling  
 2 mean they have errors in them, too?  
 3 A. Yes.  
 4 Q. Are there any areas that an order  
 5 might fall out for manual handing, even  
 6 though it could be submitted electronically?  
 7 A. None come to mind. It's either  
 8 planned fallout flow through or there's an  
 9 error that results in that falling out. If  
 10 there's some other situation, I don't recall.  
 11 (Whereupon a discussion ensued off  
 12 the record.)  
 13 Q. (By Ms. Rule) The second column  
 14 is headed F/T. Is that supposed to be a  
 15 list that describes whether or not items will  
 16 flow through?  
 17 A. Yes.  
 18 Q. If you look at footnote 5, which  
 19 is under the first entry in that column,  
 20 what does -- can you explain to me what  
 21 footnote 5 means?  
 22 A. Let me read this, please.  
 23 Q. Sure.  
 24 A. Footnote 5 is identifying some  
 25 situations where orders could manually fall

1 Q. So it appears to say to you,  
 2 also, footnote 5, general application, that  
 3 first entry under the flow through column?  
 4 A. Yes. The other footnotes appear  
 5 across the top in the columns. So I'm  
 6 thinking, maybe, as you indicated, it's just  
 7 a typo, but I will be dealing with that and  
 8 finding out.  
 9 Q. So if I understand you correctly,  
 10 though, footnote 5 is a list of conditions  
 11 that will result in design manual fallout,  
 12 even though an item is ordered electronically  
 13 and was otherwise eligible for flow through;  
 14 correct?  
 15 A. Let me go back and refresh my  
 16 memory.  
 17 Q. Okay.  
 18 A. I think that's the intent, because  
 19 it starts off, Also, this may be better for  
 20 all services to indicate yes.  
 21 Q. So if I'm understanding this  
 22 correctly, go back to the flow through  
 23 column, everything that says "yes" should be  
 24 yes, unless one of the conditions listed in  
 25 this footnote 5 apply, in which case they

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1 will fall out for manual handling?  
 2 A. As a result of this discussion,  
 3 I'm having the same inclination. I would  
 4 like to reserve the right to talk to the  
 5 author of this report. I understand what  
 6 they're intending to say. I've seen the  
 7 report many times and looked at this document  
 8 many times. It's never hit me the way it's  
 9 hitting me now.  
 10 Q. Just to walk through an example,  
 11 the second product, entry two, wire analog  
 12 port, said, yes, it should flow through?  
 13 A. Correct.  
 14 Q. But if I understand footnote 5  
 15 correctly, it should flow through, unless one  
 16 of these 12 or 13 things listed in footnote  
 17 5 are present, in which case it will fall  
 18 out?  
 19 A. That is the way I interpret it,  
 20 too.  
 21 Q. There's another question we had  
 22 about footnote 5. It says -- the very last  
 23 sentence says, All but the last one are  
 24 unique to CLEC. What does that mean?  
 25 A. Well, I need to talk to the

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1 author on that as well. They were trying to  
 2 categorize these as unique; and, frankly,  
 3 they're not all unique, but most are unique.  
 4 I think that's an area where we can go back  
 5 and look, but the majority of these are  
 6 unique to CLEC environment.  
 7 Q. Now, do you mean they don't occur  
 8 in BellSouth retail orders?  
 9 A. The way they're trying to describe  
 10 it here.  
 11 Q. Are BellSouth retail orders ever  
 12 expedited?  
 13 A. Yes.  
 14 Q. That one wouldn't be unique?  
 15 A. No. The way they labeled it  
 16 here, the author may have been trying to  
 17 categorize that about -- there's something  
 18 unique about that.  
 19 Q. Special pricing plans; does  
 20 BellSouth have special pricing plans?  
 21 A. Yes, but this is trying to deal  
 22 with a CLEC is taking over from a conversion  
 23 standpoint. That has a special pricing plan.  
 24 So that's unique from that standpoint. You  
 25 have to deal it with: Are you going to

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1 assume that special pricing plan? Are you  
 2 going to pay? There's things that have to  
 3 be dealt with. That's what's unique about  
 4 it.  
 5 Of course, it's difficult to get  
 6 every little thing down here, when we're  
 7 using our best effort to explain it without  
 8 having a voluminous document.  
 9 Q. Are you familiar with the  
 10 BellSouth's flow through matrix for OSS199?  
 11 The first page is an E-mail. Do you see  
 12 that?  
 13 A. Yes.  
 14 Q. Ms. Williamson is an AT&T  
 15 employee?  
 16 A. That's correct.  
 17 Q. Look down on the original  
 18 transmittal where it was sent to Ms.  
 19 Williamson.  
 20 A. Starts with -- Original message  
 21 from Beverly Shelton Williams.  
 22 Q. Who is she?  
 23 A. A member of the account team that  
 24 serves AT&T.  
 25 Q. She was a BellSouth employee?

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1 A. Yes.  
 2 Q. So it appears from this e-mail  
 3 that Beverly Shelton Williams forwarded a  
 4 copy of the document to Jill Williamson, an  
 5 AT&T employee; correct?  
 6 A. That's correct.  
 7 Q. Take a look at that document and  
 8 tell me if you know what it is.  
 9 MR. EDENFIELD: Are you  
 10 representing this is the document attached to  
 11 the e-mail?  
 12 MS. RULE: Yes, I am.  
 13 THE WITNESS: I don't know who  
 14 developed the document at BellSouth, but it's  
 15 talking about the requisition type, and  
 16 activations is the first page that defines  
 17 the issue 9 version, part of OSS99, which  
 18 refers to a release that was made in,  
 19 actually, December or January past year time  
 20 frame, final production in January. Has  
 21 attached to it the combinations of the cables  
 22 that you can use with flow through purposes  
 23 as well as a series of pages that have  
 24 comments.  
 25 Q. (By Ms. Rule) Would you please